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Attorneys for Plaintiffs and the Putative Class

**UNITED STATES DISTRICT COURT
DISTRICT OF UTAH**

TRACY TANNER, individually and
on behalf of all others similarly situated,

Plaintiffs,
v.

SNAP FINANCE LLC and
SNAP RTO LLC,

Defendants.

TAMEKA MONTGOMERY and STERLING
SIMEON, individually and
on behalf of all others similarly situated,

Plaintiffs,
v.

SNAP FINANCE LLC and
SNAP RTO LLC,

Defendants.

Case No. 2:22-cv-00761-TS-JCB

CLASS ACTION

PLAINTIFFS TRACY TANNER’S,
TAMEKA MONTGOMERY’S,
STERLING SIMEON’S, AND
VICTOR SANCHEZ’S UNOPPOSED
MOTION TO CONSOLIDATE AND
APPOINT INTERIM CO-LEAD
COUNSEL

Case No. 2:22-cv-00775

CLASS ACTION

VICTOR SANCHEZ, individually and
on behalf of all others similarly situated,

Plaintiffs,
v.

SNAP FINANCE LLC and
SNAP RTO LLC,

Defendants.

Case No. 2:22-cv-00791

CLASS ACTION

Plaintiffs Tracy Tanner, Tameka Montgomery, Sterling Simeon, and Victor Sanchez (“Plaintiffs”), by and through their counsel of record, hereby submit the following Unopposed Motion to Consolidate and Appoint Interim Co-Lead Counsel:

I. INTRODUCTION

Pursuant to Federal Rule of Civil Procedure 42(a) and District of Utah Civil Rule 42-1(a), Plaintiffs Tracy Tanner, Tameka Montgomery, Sterling Simeon, and Victor Sanchez seek an Order from this Court consolidating *Tanner v. SNAP Finance, LLC, et al.*, No. 2:22-cv-00761-TS-JCB, *Montgomery, et al. v. SNAP Finance, LLC, et al.*, No. 2:22-cv-00775-RJS, and *Sanchez v. SNAP Finance, LLC, et al.*, No. 2:22-cv-00791-RJS-JCB (collectively, the “Related Actions”). Plaintiffs Tanner, Montgomery, Simeon, and Sanchez also seek an Order pursuant to Fed. R. Civ. P. 23(g)(3) appointing M. Anderson Berry of Clayco C. Arnold, APLC, William B. Federman of Federman and Sherwood, and Brian Flick of DannLaw (collectively, “Proposed Interim Co-Lead Counsel”) as interim co-lead class counsel; and Charles H. Thronson as liaison counsel (“Proposed Liaison Counsel”) in the consolidated litigation on behalf of Plaintiffs and the putative class.

Consolidation of the Related Actions here is appropriate. Each Related Action pertains to an alleged common data breach that Plaintiffs allege impacted Defendants Snap Finance LLC and

Snap RTO LLC (collectively “Snap”), Plaintiffs, and members of the putative class. These cases arise from the same nucleus of common facts and are brought against common defendants—Snap. Consolidation will provide for complete resolution in one proceeding and avoid unnecessary duplication of work and the risk of inconsistent adjudications. Consolidating the Related Actions for all purposes will therefore provide all the benefits of consolidation and promote the interests of judicial economy and convenience with no prejudice to the parties and the putative class.

M. Anderson Berry, William B. Federman, Brian Flick, and Charles H. Thronson are best qualified to lead the consolidated litigation on behalf of the putative class. Proposed Interim Co-Lead Counsel are three of the nation’s leading class action and data breach practitioners, and Proposed Interim Liaison Counsel is a leading civil litigation practitioner in the State of Utah. Proposed Interim Class Counsel should be appointed as Interim Co-Lead Counsel and Interim Liaison Counsel because they meet the factors defined in Federal Rule of Civil Procedure 23(g).

For the reasons set forth herein, Plaintiffs respectfully request that the Related Actions be consolidated, and M. Anderson Berry, William B. Federman, and Brian Flick be appointed as Interim Co-Lead Counsel and Charles H. Thronson be appointed as Interim Liaison Counsel. Plaintiffs conferred with counsel for Snap, who has advised that although Snap does not endorse the contents of this Motion, it is not opposed to the requested consolidation, takes no position on the proposed leadership, and reserves all rights and defenses with respect to Plaintiffs’ claims.

II. BACKGROUND

There are three related actions pending against Snap in the District of Utah: *Tanner v. SNAP Finance, LLC, et al.*, No. 2:22-cv-00761-TS-JCB, *Montgomery, et al. v. SNAP Finance, LLC, et al.*, No. 2:22-cv-00775-RJS , and *Sanchez v. SNAP Finance, LLC, et al.*, No. 2:22-cv-

00791-RJS-JCB. All of the Related Actions are proposed consumer class actions against Snap relating to an alleged data breach that impacted SNAP. Plaintiffs claim that between June 23, 2022 and September 8, 2022, unauthorized individuals gained access to Snap’s computer network and accessed and removed the sensitive information of Plaintiffs and putative class members from Snap’s system. They further claim that during the breach, approximately 61,302 individuals’ personally identifying information (“PII”) was exposed, including: names, Social Security numbers, driver’s license numbers, and financial information.

On December 9, 2022, the *Tanner* action was filed. *See Tanner*, ECF No. 1. The *Montgomery* action was filed on December 14, 2022. *See Montgomery*, ECF No. 1. The third-filed case, *Sanchez*, was filed on December 21, 2022. *See Sanchez*, ECF No. 2. All of the Related Actions name Snap and include overlapping claims. Each action is in its infancy, and a responsive pleading or response has not been filed in the Related Actions.

III. ARGUMENT

A. Consolidation is Appropriate

Fed. R. Civ. Pro. 42(a) states, “If actions before the court involve a common question of law or fact, the court may: . . . consolidate the actions. . . .” Additionally, DUCivR 42-1 allows for the filing of a motion for consolidation when the cases: “(1) arise from substantially the same transaction or event; (2) involve substantially the same parties or property; (3) involve the same patent, trademark, or copyright; (4) call for determination of substantially the same questions of law; or (5) for any other reason would entail substantial duplication of labor or unnecessary court costs or delay if heard by different judges.” In considering consolidation, courts weigh “the saving of time and effort that consolidation under Rule 42(a) would produce against any inconvenience,

delay, or expense that it would cause for the litigants and the trial judge.” 9A Charles Alan Wright & Arthur R. Miller, *FEDERAL PRACTICE & PROCEDURE: CIVIL* § 2383 (3d ed. 2008).

Here, the Related Actions arise from the same transaction or event, involve the same defendant, and raise many of the same questions of law. The Related Actions all center around the alleged data breach that Plaintiffs claim exposed the PII of Snap’s customers and seek to represent a nationwide class of those affected by the breach, common theories of recovery are raised in the Related Actions, as the three complaints all bring claims for negligence against Snap, arguing that Snap violated its duty to protect its customer’s PII and all allege that Snap owes damages to those affected by the data breach. Plaintiffs maintain that questions of law regarding these claims will be substantially similar because all of the Related Actions arise out of the same core nucleus of facts. Plaintiffs also believe that any individual questions affecting the Plaintiffs will be minor compared to the common questions they share.

Consolidation will serve the interests of judicial economy by eliminating duplicative and overlapping litigation. Consolidation will clarify, in one proceeding, the individual actions by providing a more comprehensive context for the parties’ claims. Because no Related Action has proceeded beyond any other, and all are still in their infancy, it is an appropriate and convenient time to consolidate the Related Actions. Doing so will conserve judicial resources and ensure that there are no inconsistent results between the cases. Courts consistently find that overlapping data breach class actions are particularly appropriate for consolidation. *See, e.g., Rubenstein v. Scripps Health*, No. 21cv1135-GPC(MSB), 2021 U.S. Dist. LEXIS 192182, at *4 (S.D. Cal. Oct. 5, 2021) (granting motion to consolidate data breach cases that “involve the same underlying facts and substantially similar questions of law”); *Kaplan v. 21st Century Oncology Holdings*, No. 2:16-cv-

210-FtM-99MRM, 2016 U.S. Dist. LEXIS 105791, at *13 (M.D. Fla. July 21, 2016) (“[I]t is clear that common questions of law and fact permeate these cases [because] . . . all of the cases appear to arise from the same alleged data breach.”). There is no reason to reach a different decision here, and for the foregoing reasons, consolidation of the Related Actions is warranted.

B. Appointment of Proposed Interim Co-Lead Counsel is Warranted

Pursuant to Federal Rule of Civil Procedure 23(g)(3), Plaintiffs also respectfully move for an order appointing: (i) M. Anderson Berry of Clayeo C. Arnold, APLC (the “Arnold Law Firm”); (ii) William B. Federman of Federman & Sherwood; (iii) Brian Flick of DannLaw (collectively, “Proposed Interim Co-Lead Counsel”) as interim co-lead counsel; and (iv) Charles H. Thronson as liaison counsel (“Proposed Liaison Counsel”) (collectively, “Proposed Interim Class Counsel”).

i. Legal Standards

Federal Rule of Civil Procedure 23(g)(3) permits the appointment of interim lead counsel “to act on behalf of putative class members before determining whether to certify the action as a class action.” Fed. R. Civ. P. 23(g)(3). Designating lead counsel now ensures the protection of the interests of the putative class in making and responding to motions, conducting discovery, and negotiating possible settlements. *Syzmczak v. Nissan N. Am., Inc.*, Nos. 10 CV 7493(VB), 12 CV 2149(VB), 2012 WL 1877306, at *1 (S.D.N.Y. May 15, 2012) (citing *Manual for Complex Litig.* § 21.11 (4th ed. 2004)). Fed. R. Civ. P. 23(g) states four factors courts should look to in selecting class counsel: “(i) the work counsel has done in identifying or investigating potential claims in the action; (ii) counsel’s experience in handling class actions, other complex litigation, and the types of claims asserted in the class action; (iii) counsel’s knowledge of the applicable law; and (iv) the resources that counsel will commit to representing the class.” *Id.*

ii. Proposed Interim Class Counsel Satisfy Rule 23(g)

Proposed Interim Co-Lead Counsel and Liaison Counsel satisfy all of the Fed. R. Civ. P. 23(g)(3) requirements. Accordingly, the requested appointment is appropriate.

a. Proposed Interim Class Counsel Have Performed Substantial Work Investigating and Litigating the Claims to Date

Proposed Interim Class Counsel have committed substantial time and resources to organizing and working together toward the advancement of the litigation. Immediately after the public announcement of the data breach involving Defendant, Proposed Interim Co-Lead Class Counsel began investigating the facts of the data breach, researching potential legal claims and remedies for the victims of the breach, drafting initial pleadings; investigating experts in the area of data security and damages; and organizing plaintiffs and counsel in the related actions to coordinate for unified and efficient proceedings. These actions demonstrate their willingness and ability to prosecute this action on behalf of the putative class to the fullest extent possible. Proposed Interim Co-Lead Counsel will continue to expend the time and resources necessary to advocate for the putative class.

b. Proposed Interim Class Counsel Possess the Necessary Experience and Skill to Prosecute This Action

Proposed Interim Class Counsel possess the experience and skill to prosecute this action efficiently and effectively. As demonstrated in their attached résumés, all three of the Proposed Interim Co-Lead Counsel have extensive experience leading complex data-breach and privacy class actions. *See Exhibits 1 – 3.* Proposed Interim Liaison Counsel is similarly well experienced, particularly within the State of Utah. *See Exhibit 4.*

1. M. Anderson Berry (Arnold Law Firm)

Mr. Berry is the head of the Complex Litigation Department at the Arnold Law Firm, with an extensive background in privacy and consumer/government fraud litigation, actively participating in a currently sealed False Claims Act case involving widespread cybersecurity fraud upon the United States. *See Exhibit 1* (Clayeo C. Arnold, APLIC résumé). He is litigating more than fifty class action cases across the country involving data breaches, including the following matters: *Holmes v. Elephant Insurance Company, et al.*, No. 3:22-cv-00487-JAG (E.D.VA.) (Co-Lead Counsel); *In Re: Arthur J. Gallagher Data Breach Litigation*, No. 1:21-cv-04056 (N.D.Ill.) (Co-Lead Counsel); *Rossi v. Claire's Stores*, No. 1:20-cv-05090 (N.D. Ill. filed Aug. 28, 2020) (Co-Lead Counsel) (settled); *In re: CaptureRx Data Breach Litigation*, No. 5:21-cv-00523 (W.D.TX filed June 2, 2021) (Co-Lead Counsel) (settled); *Riggs v. Kroto, Inc.*, No. 1:20-cv-5822 (N.D. Ill. filed Sept. 30, 2020) (Co-Lead Counsel) (settled); *Desue v. 20/20 Eye Care Network, Inc. et al.*, No. 0:21-cv-61275 (S.D. Fla.) (Executive Comm.); *In re: Mednax Servs., Inc., Customer Data Security Breach Litig.*, No. 21-MD-02994 (S.D. Fla.) (Executive Comm.); and *A.A. ex rel. Altes v. AFTRA Ret. Fund*, No. 1:20-cv-11119 (S.D.N.Y. filed Dec. 31, 2020) (Co-Lead Counsel).

2. William B. Federman (Federman & Sherwood)

Mr. Federman, the founder of Federman & Sherwood, has more than forty (40) years of diverse trial, appellate, data breach, complex financial fraud, commercial, consumer, and class action litigation experience, representing both plaintiffs and defendants in federal and state courts as well as arbitration forums across the country. Mr. Federman has litigated numerous data breach cases and has extensive experience as lead or co-lead counsel in consumer class actions and MDLs. *See Exhibit 2* (Federman & Sherwood résumé). Mr. Federman, and the Federman & Sherwood

firm, have thwarted multiple motions to dismiss filed in data breach class actions. *See, e.g., In re: Solara Medical Supplies Data Breach Litig.*, Case No. 3:19-cv-00284-H-KSC (S.D. Cal.) (May 7, 2020) (ECF No. 42); *Neville McFarlane, et al. v. Altice USA, Inc.*, Case No. 1:20-cv-01297-JMF (S.D.N.Y.) (Mar. 8, 2021) (ECF No. 58); *Finesse Express, LLC, et al. v. Total Quality Logistics, LLC*, Case No. 1:20-cv-00235 (S.D. Ohio) (March 30, 2021) (ECF No. 22); *Mackey, et al. v. Belden, Inc.*, Case No. 21-cv-00149 (Aug. 3, 2021) (ECF No. 22); *Fischer v. CentralSquare Techs., LLC*, Case No. 21-cv-60856-RAR (S.D. Fla) (Sept. 15, 2021) (ECF No. 28); *In re: Mednax Servs., Inc., Customer Data Security Breach Litig.*, Case No. 21-MD-02994 (S.D. Fla.) (Aug. 18, 2022) (ECF No. 131). Notably, Mr. Federman serves as co-lead counsel in the consolidated multi-party data breach case *In re: Brinker Data Incident Litig.*, Case No. 3:18-cv-686-J-32MCR (M.D. Fla.), which not only survived multiple motions to dismiss but is the first consumer payment card data breach case in the country to be certified as a class action in a contested hearing.

3. Brian Flick (DannLaw)

Brian Flick, the Managing Partner of DannLaw's Cincinnati Office and Class Action Practice, has more than fifteen (15) years of class action litigation experience. Mr. Flick has litigated numerous data breach cases and has served as lead, co-lead, or liaison counsel in multiple consumer class actions and MDLs. *See Exhibit 3* (DannLaw résumé); *see, e.g., Patrick D. Trivison, et al. v. Federal National Mortgage Association, et al.*, NDOH Case No. 1:20-cv-0711 (Co-Lead for putative class); *Elaine Johnson v. LoanDepot.com, LLC*, NDOH Case No. 5:22-cv-00641 (same); *Jackson, et al. v. Velocity Investments, LLC*, EDPA Case No. 1:20-cv-02524 (same); *Crews, et al. v. Titlemax of Delaware, et al.*, MDPA 1:22-cv-168 (same). Notably, Mr.

Flick served as Co-Lead counsel in *Southern Ohio Health Systems Data Breach*, Case No. A2101886 (Hamilton Cnty. Ct. of Common Pleas), which recovered \$1.95 million for a nationwide class of persons whose personal information was stolen as part of a data breach, as well as in *Ryder et al v. Wells Fargo Bank, N.A.*, Case No. 1:19-cv-00638 (S.D. Ohio), a case in which there was a \$12 million recovery for borrowers who were wrongfully denied loan modifications.

4. Charles H. Thronson (Parsons Behle and Latime)

Charles Thronson is the senior active partner in the 180-lawyer firm of Parsons Behle and Latime, the largest law firm in Utah and one of the three hundred largest firms in America. Mr. Thronson has practiced for over 43 years in state and federal courts around the United States, and before the Court of Federal Claims. He has practiced in the areas of general litigation, environmental law, labor law, business litigation and, most recently, medical malpractice. A copy of his résumé is attached hereto as **Exhibit 4**.

c. Proposed Interim Class Counsel Have Committed, and Will Continue to Commit, the Resources Necessary to Fairly and Adequately Represent the Class

Proposed Interim Class Counsel can, as needed, draw upon the skills and talents of experienced attorneys and staff members located across the country. Each attorney understands the time, energy, and skill necessary to lead this litigation and all have committed the resources required to ensure the effective and efficient representation of the putative class members. They are also expected to pay assessments when necessary to ensure that adequate funds are available to prosecute this litigation. And, as their firm résumés and counsels' experience indicate, Proposed Interim Class Counsel have the resources to see this litigation through to its conclusion, including trial. *See Exhibits 1 - 4*.

d. Other Factors Support Designating Proposed Interim Class Counsel

It is useful to consider whether counsel applying for leadership “have worked together in other cases” and “their ability to collaborate in the past[.]” Bolch Judicial Institute, Duke Law School, *Guidelines and Best Practices for Large and Mass-Tort MDLs* at 38, 43 (2d ed. 2018), available at <https://judicialstudies.duke.edu/wp-content/uploads/2018/09/MDL-2nd-Edition-2018-For-Posting.pdf>. Selecting lawyers who have worked together has many benefits. They have established working relationships and “developed certain systems for handling workflow and comparative advantages that will help expedite the case relative to a leadership committee working together for the first time.” *Id.*

Proposed Interim Co-Lead Counsel have each worked together and are currently working together on several major data breach class actions. *See, e.g., White, et al., v. Medical Review Institute of America*, Case No. 2:22-cv-00082 (D. Utah), *In re: Mednax Servs., Inc., Customer Data Security Breach Litig.*, Case No. 21-MD-02994 (S.D. Fla.), *Durgan, et al., v. U-Haul International Inc.*, Case No. 2:22-cv-1565 (D. Ariz.). Proposed Interim Co-Lead Counsel know they are able to work together effectively. Indeed, they have already discussed how best to organize their members’ diverse skills for the efficient prosecution and management of this litigation, while avoiding duplicative billing. If appointed, Proposed Interim Co-Lead Counsel will establish a protocol for regular time and expense reporting to monitor and manage the efficient prosecution of this action.

VI. CONCLUSION

For all these reasons, Plaintiffs respectfully request that this Court consolidate the related actions and appoint M. Anderson Berry, William B. Federman, and Brian Flick as Proposed Interim Co-Lead Counsel and Charles H. Thronson as Proposed Liaison Counsel.

January 3, 2023

Respectfully submitted,

/s/ Charles H. Thronson

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**pro hac vice applications are pending or
are forthcoming*

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on January 3, 2023, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using CM/ECF. Copies of the foregoing document will be served upon interested counsel via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Charles H. Thronson
Charles H. Thronson

EXHIBIT 1



Arnold Law Firm Biography

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Founded in 1975 by Clayeo C. Arnold, the Arnold Law Firm is a litigation-oriented practice in Sacramento, California. In keeping with its founding principles, our firm consciously works for the interests of individual people and small businesses — not for large corporations or insurance companies.

The Arnold Law Firm prosecutes class action, mass tort, *qui tam*, product defect, employment, and personal injury cases. We pride ourselves on being a practice of trial lawyers, typically trying a minimum of ten cases per year to verdict. In addition to our practice throughout the state of California in both state and federal courts, we pursue class action, *qui tam* and multi-district litigation claims on a nationwide basis.

Our team of nine attorneys collectively encompass a broad, diverse professional background, including plaintiff contingency work, public entity representation, criminal defense, and civil defense. We have current and past board members of Capital City Trial Lawyers Association, as well as members of numerous prestigious professional organizations, including the American Board of Trial Advocates, American Association for Justice, Association of Trial Lawyers of America, and Consumer Attorneys of California.

Our firm's operating structure is based on teams directed towards specific practice areas. These teams regularly and intentionally collaborate and exchange information between their practice areas to improve the quality of representation for all of our clients.



Arnold Law Firm Biography

(continued)

Over four decades the Arnold Law Firm has developed a respected and extensive network of co-counsel and experienced contract counsel to rapidly expand our capabilities as necessary on an *ad hoc* basis (e.g., document review). We employ a robust staff of highly qualified, experienced assistants and paralegals to ensure that attorney time is spent in the most efficient manner possible.

The Arnold Law Firm employs technology to increase productivity, resulting in lower hourly billing, even though adverse parties eventually pay those bills. The firm increases efficiencies by using template software, client management software, and secure internet-based client management for mass tort or multi-plaintiff litigation. We also invest in appropriate billing and tracking software for contemporaneous hourly record keeping.

The Arnold Law Firm places substantial value on representing clients in a manner that is both effective and courteous. Integrity with clients, the courts, and adverse counsel are all considered to be as indispensable as successful results.

Our highly accomplished counsel has a long history of successfully handling class actions across a range of industries, including data breach cases.



M. Anderson Berry Biography



The Arnold Law Firm has a proven track record of success and the ability to work efficiently and cooperatively with others. In addition, our firm has the availability and resources necessary to litigate complex class actions.

M. Anderson Berry

M. Anderson Berry heads the data breach complex litigation and *qui tam* practices for the Arnold Law Firm. He brings substantial experience in complex litigation matters with a history of litigating in an efficient and practical manner, including Lead Class Counsel, Co-Lead Class Counsel, and Plaintiff's Executive Committee.

Mr. Berry has an extensive background in privacy and consumer/government fraud litigation, actively participating in a currently sealed False Claims Act case involving widespread cybersecurity fraud upon the United States, and the class action litigations filed in federal courts across the nation, set out below.

Mr. Berry was first selected as the Northern California Super Lawyers Rising Star in 2015 in the field of complex civil litigation.

Before joining the Arnold Law Firm in 2017, Mr. Berry worked as an Assistant United States Attorney for the Eastern District of California. As part of the Affirmative Civil Enforcement unit, Mr. Berry handled a wide variety of complex cases, recovering millions of dollars for the United States.

Before working for the Department of Justice, Mr. Berry practiced at one of the world's largest law firms, Jones Day, where he represented clients in international arbitration and complex commercial litigation, including defending class action allegations.



M. Anderson Berry Biography

(continued)

Mr. Berry attended the University of California, Berkeley, where he majored in English and graduated with highest honors. Anderson was inducted into the Phi Beta Kappa Honor Society and served as President of the English Undergraduate Associate.

After working as a private investigator for both criminal and civil investigations in the San Francisco Bay Area, Anderson graduated from U.C. Berkeley School of Law, where he was a Senior Editor for both the *Berkeley Journal of Criminal Law* and *Berkeley Journal of International Law*.

He was admitted to the California Bar in 2009 and is admitted to practice in the Northern, Eastern and Central Districts of California. Mr. Berry is also admitted to practice in the Eastern District of Michigan and the Northern District of Illinois.

Mr. Berry was raised in Moraga, California.

Select Data Breach Cases

Holmes v. Elephant Insurance Company, et al., 3:22-cv-00487-JAG (E.D. VA.) (Co-Lead Counsel);

In Re: Arthur J. Gallagher Data Breach Litigation, 1:21-cv-04056 (N.D.Ill.)(Co-Lead Counsel);

In Re: CaptureRx Data Breach Litigation, 5:21-cv-00523 (W.D.TX.)(Co-Lead Counsel);

Rossi v. Claire's Stores, 1:20-cv-05090 (N.D. Ill.) (Co-Lead Counsel);

Desue v. 20/20 Eye Care Network, Inc. et al., 0:21-cv-61275 (S.D. Fla.)(Executive Comm.);

In re: Mednax Services, Inc. Customer Data Security Breach Litigation, 21-MD-02994 (S.D. Fl.)(Executive Comm.);

Hashemi et al. v. Bosley, Inc. 2:21-cv-00946 (CD. Cal.) (Class Counsel)(settled);



M. Anderson Berry Biography

(continued)

Heath et al. v. Insurance Technologies Corp et al.,
3:21-cv-01444 (N.D. Tex.)(Class Counsel)(settled);

Gilbert v. AFTRA Retirement Fund et al, 1:20-cv-10834-
ALC (S.D.N.Y.)(Co-Lead Counsel);

Carrera Aguillo et al. v. Kemper Corporation et al.,
1:21-cv-01883 (N.D. Ill.) (Class Counsel)(settled);

Ahn et al. v. Herff Jones, LLC, 1:21-cv-01381 (S.D. Ind.)
(settled);

Bitmouni v. Paysafe Limited, 3:21-cv-00641-JCS
(N.D. Cal.);

Edke v. Belden, Inc., 2021CH00047 (E.D.Mo.);

Johnson v. O.K. Foods, Inc., 5:21-cv-00561 (W.D. Ar.);

*Marcaurel et al. v. USA Waste-Management Resources,
LLC et al.*, 4:21-cv-02027 (S.D. Tex.).

Gaston v. FabFitFun, Inc., 2:20-cv-09534 (C.D. Cal.)
(Class Counsel)(settled);

Hamid et al. v. Canon, U.S.A., Inc. et al. 1:20-cv-06380-
AMD-SJB (E.D.N.Y.);

In Re: Ambry Genetics Data Breach Litigation,
8:20-cv-00791 (C.D. Cal.);

*In Re: Hanna Andersson and Salesforce.com Data Breach
Litigation*, 3:20-cv-00812-EMC (N.D. Cal.)(Co-Lead
Class Counsel) (settled);

In Re: Morgan Stanley Data Security Litigation,
1:20-cv-05914 (S.D.N.Y.)(settled);

Pfeiffer et al. v. RadNet, Inc., 2:20-cv-09553-RGK-SK
(C.D. Cal.)(Class Counsel)(settled);

Thomsen v. Morley Companies, Inc., 1:22-cv-10271-TLL
(E.D. Mi.) (settled);

*IN RE: VOLKSWAGEN GROUP OF AMERICA, INC. DATA
INCIDENT LITIGATION*, 4:21-cv-09203-DMR (N.D. Ca.)
(Class Counsel);

In re Lakeview Loan Servicing Data Breach Litigation,
1:22-cv-20955-DPG (S.D. Fl.);

Myron Schellhorn et al v. Timios, Inc., 2:21-cv-08661-VAP
-JC (C.D. Ca.).

EXHIBIT 2

FEDERMAN & SHERWOOD

(An Association of Attorneys and Professional Corporations)

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FACSIMILE: 214-740-0112

FIRM RESUME

WILLIAM B. FEDERMAN. Education: Boston University (B.A., cum laude, 1979); University of Tulsa (J.D., 1982); Phi Alpha Delta (Treasurer, 1980-1982). Admitted to practice: United States District Courts for the following Districts: Western, Northern and Eastern, Oklahoma; Eastern and Southern, New York; Southern, Northern, Eastern and Western, Texas; Eastern and Western, Arkansas; District of Columbia; District of Colorado; Northern, Ohio; District of Nebraska; Eastern District of Michigan; Eastern District of Wisconsin; United States Court of Appeals for the following Circuits: First, Second, Third, Fourth, Fifth, Sixth, Seventh, Eighth, Ninth, Tenth and Eleventh and Federal; and United States Supreme Court. Lectures/Publications: "Class Actions, New Rules and Data Breach Cases," 40th Annual OCBA Winter Seminar 2019; "A Case Study of Ethical Issues in Complex Litigation and Trends in Class Certification," 39th Annual OCBA Winter Seminar, 2018; "Talkin' About Insurance Coverage and Complex Litigation: What Every Lawyer and Client Should Know," 38th Annual OCBA Winter Seminar, 2017; "Securities Litigation: Using Data to Make the Case," by Bloomberg BNA, 2016; "The Changing Landscape for Prosecution of Financial Claims Involving Insolvent Companies" 37th Annual OCBA Winter Seminar, 2016; "Current Status of Securities Class Actions: Where are the Courts Taking Us?" Houston Bar Association, 2014. "Class & Derivative Actions and Securities Litigation," 2013 Annual Meeting of the American Bar Association; "Litigation and Employment Law Update," Securities Industry Association Compliance and Legal Division; "Inside a Disclosure Crisis", 30th Annual Northwest Securities Institute Annual Meeting and sponsored by the Washington Bar Association; "Managing Directors' Liability," 3rd Annual Energy Industry Directors Conference and sponsored by Rice University; "Executive Liability - 2009 D & O Market Trends," Chartis Insurance; "Derivative Actions and Protecting the Corporation – Critical Issues in Today's Banking," Oklahoma Bar Association and the Oklahoma Bankers Association; "Arbitration - What Is It? Why Should a Lawyer Suggest or Use It?," Oklahoma Bar Association; "The Attorney and Accountant as Targets in Failed Financial Institution Litigation," American Bar Association Trial Practice Committee; "Effective Arbitration in the 1990's - Adapting to Build a Successful Practice," Oklahoma County Bar Association; "Current Issues in Direct Investments and Limited Partnerships: The Litigation Scene From All Perspectives," American Bar Association Litigation Section; "Stockbroker Litigation and Arbitration," Securities Arbitration Institute. Author: "Who's Minding the Store: The Corporate Attorney-Client Privilege," 52 O.B.J. 1244, 1981; "Potential Liability From Indirect Remuneration in Private Oil and Gas Offerings," 11 Sec. Reg. L.J. 135, 1983; "Capitalism and Reality Meet in the Courts. . . Finally," 59 O.B.J. 3537, 1987; "Class Actions, New Rules & Data Breach Cases," Annual OCBA Winter Seminar, 2019. Membership: Arbitration Panel, New York Stock Exchange; Federal Bar Association; Oklahoma County Bar Association (Committee on Professionalism, 1987-1990); Oklahoma Bar Association (Civil Procedure/Evidence Code, Lawyers Helping Lawyers Assistance Program and Rules of Professional Conduct Committees, 2017-2020); American Bar Association (Committee on Securities Litigation and Corporate Counsel); American Inns of Court (Barrister 1990-1993 and Master 2002-2004); inducted into the Outstanding Lawyers of America, 2003; received the Martindale-Hubbell peer review rating of AV Preeminent in both ethical standards and legal ability; recognized as one of the "Top Lawyers of 2013" for excellence and achievements in the legal community; Litigation Counsel of America (Trial Lawyer & Appellate Lawyer Honorary Society). Awards/Honors: Securities Litigation and Arbitration Law Firm of the Year in Oklahoma – 2018 (Global Law Experts Annual Awards); Securities Litigation and Arbitration Law Firm of the Year in Oklahoma – 2019, 2020 (Corporate INTL Magazine); Oklahoma Super Lawyers list by Thomson Reuters – 2019; Recognized for Exceptional Service and Outstanding Performance on behalf of the Federal Bar

FEDERMAN & SHERWOOD
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Association (Oklahoma City Chapter) Pro Bono Program – 2018-2019, 2020, Oklahoma Super Lawyer for 2022.

STUART W. EMMONS. (In Memoriam) Education: University of Oklahoma (J.D., 1987, with distinction); University of Oklahoma (B.B.A., Accounting, 1984, with distinction). Admitted to practice: 1987, Oklahoma; 1987, U.S. District Court for the Western District of Oklahoma; 1990, U.S. District Court for the Northern District of Oklahoma; 1992, U.S. Court of Appeals, Tenth Circuit; 1994, U.S. Court of Appeals, Eighth Circuit; U.S. Patent and Trademark Office; 2002, U.S. District Court for the District of Colorado; U.S. District Court for the Southern District of Texas; 2003, U.S. Court of Appeals, Second Circuit; 2004, U.S. District Court for the Northern District of Texas; U.S. Court of Appeals, Fifth Circuit; 2005, United States Supreme Court; 2005 U.S. Court of Appeals, Fourth Circuit; 2015, U.S. Court of Appeals, First Circuit; 2016, U.S. Court of Appeals, Ninth Circuit and U.S. Court of Appeals for the First Circuit. 1988-1989, Law Clerk to the Hon. Layn R. Phillips, U.S. District Court for the Western District of Oklahoma. Published Decisions: *American Fidelity Assurance Company v. The Bank of New York Mellon*, 810 F.3d 1234 (10th Cir. 2016); *Paul Spitzberg v. Houston American Energy Corporation, et al.*, 758 F.3d 676 (5th Cir. 2014); *Patipan Nakkhumpun v. Daniel J. Taylor, et al.*, 782 F.3d 1142 (10th Cir. 2015); Membership: Oklahoma County and Oklahoma Bar Associations.

SARA E. COLLIER. Education: Oklahoma Christian University (B.S. 2000); Oklahoma City University School of Law (J.D. 2004). Admitted to practice: 2005, Oklahoma; 2005, U.S. District Courts for the Western, Eastern and Northern Districts of Oklahoma; 2007, U.S. District Court for the Southern District of Texas; and 2007, United States Court of Appeals for Veterans Claims in Washington, DC. Membership: Oklahoma Bar Association, American Bar Association.

MOLLY E. BRANTLEY. Education: University of Oklahoma (B.A., 2013); Oklahoma City University School of Law (J.D., 2017; Merit Scholar 2014-2017). Admitted to practice: Oklahoma, 2017; United States District Court for the Northern District of Oklahoma; United States District Court for the Western District of Oklahoma, 2020. Membership: Oklahoma Bar Association; Federal Bar Association.

D. COLBY ADDISON. Education: University of Oklahoma (B.S., 2013); University of Oklahoma (J.D., 2016). Admitted to practice: Oklahoma, U.S. District Courts for the Western, Eastern and Northern Districts of Oklahoma, 2016. Membership: Oklahoma Bar Association; Federal Bar Association, Oklahoma Employment Lawyers Association, National Employment Lawyers Association. Mr. Addison is experienced in all aspects of complex litigation and has successfully litigated numerous class actions from inception through discovery and court approved settlement. Prior to joining Federman & Sherwood, Mr. Addison was a co-founder of a firm that specialized in wage and hour collective action and discrimination cases. Mr. Addison has earned the distinction of SuperLawyers for 2019, 2020, and 2021. He has been a featured speaker and lecturer on labor and employment law topics, including as a CLE educator. Mr. Addison has served as Lead or Co-Lead for Plaintiffs in multiple complex litigation cases.

KENNEDY M. BRIAN. Education: University of Central Oklahoma (Musical Theater and Real Estate Finance, 2018) University of Oklahoma (J.D. 2021). Admitted to practice: Oklahoma 2021. Membership: Oklahoma Bar Association and Oklahoma County Bar Association. Prior to joining Federman & Sherwood, Mrs. Brian was actively involved in litigation on various estate planning, probate and trust matters.

OF COUNSEL:

JOHN CHARLES SHERWOOD. Education: Texas Christian University, (BBA, magna cum laude, 1981); Baylor School of Law (J.D., 1984). Areas of Practice: Litigation. Board Certified: Civil Trial Law, Personal Injury Trial Law, Texas Board of Legal Specialization. Organizations: Texas Trial Lawyers, Association of Trial Lawyers of America, Dallas Trial Lawyers Association, Dallas Bar Association, Former Chairperson of the Solo and Small Firm Section of the Dallas Bar Association (1999), Member of the College of the State Bar of Texas, and founding President of Citizens For a Fair Judiciary (Political Action Committee). Licenses and Courts of Practice: Member of the State Bar of Texas, National Board of Trial Advocacy, Licensed as a Certified Public Accountant by the Texas State Board of Public Accountancy, admitted to practice before the United States Tax Court, United States District Court, Northern District of Texas, United States Fifth Circuit Court of Appeals, and the United States Supreme Court. Papers Presented: *Other People's Money*, Presented to the Dallas Bar Association, Solo and Small Firm Section; Recognition: "Top Attorneys in Texas, Business Litigation," (2012).

A. BROOKE MURPHY. Education: Oklahoma City University (B.A. summa cum laude, 2005; Robert L. Jones Outstanding Senior Paper Award; Women's Leadership Award); University of Oklahoma College of Law (J.D. 2010, with honors; Dean's List; First Amendment Moot Court Team; Assistant Articles Editor of Oklahoma Law Review). Admitted to practice: Oklahoma, 2010; U.S. District Court for the Western District of Oklahoma, 2010; U.S. District Court for the Northern District of Texas, 2010; Tenth Circuit Court of Appeals, 2014; First Circuit Court of Appeals and Ninth Circuit Court of Appeals, 2016; Second Circuit Court of Appeals, 2021. Published Decisions: *Paul Spitzberg v. Houston American Energy Corporation, et al.*, 758 F.3d 676 (5th Cir. 2014); *Patipan Nakkhumpun v. Daniel J. Taylor, et al.*, 782 F.3d 1142 (10th Cir. 2015); *Angley v. UTi Worldwide Inc.*, 311 F. Supp. 3d 1117 (C.D. Cal. 2018); *Mulderrig v. Amyris, Inc.*, 492 F. Supp. 3d 999 (N.D. Cal. 2020); *McFarlane v. Altice USA, Inc.*, 524 F. Supp. 3d 264 (S.D.N.Y. 2021). Publication: *Credit Rating Immunity? How the Hands-Off Approach Toward Credit Rating Agencies Led to the Subprime Credit Crisis and the Need for Greater Accountability*, 62 Okla. L. Rev. 735 (2010). Membership: Oklahoma Bar Association. Recognition: *Oklahoma Super Lawyers*, "Rising Star," 2020, 2021, 2022.

JOSHUA D. WELLS. Education: Oklahoma Baptist University (B.A. 2004); Oklahoma City University College of Law (J.D. 2008) (Dean's List, Faculty Honor Roll, OCU American Trial Lawyers Association Moot Court Team, 2008; Staff Member, Law Review, 2006-07; Executive Editor, Law Review, 2007-08). Admitted to practice: 2008, Oklahoma; Federal Bar Association; American Bar Association; U. S. District Court for the Western District of Oklahoma; 2009, U.S. District Court for the Eastern District of Oklahoma; 2011, U.S. District Court for the Northern District of Oklahoma; 2012, U.S. Court of Appeals for the Tenth Circuit; 2016, U.S. Court of Appeals, Fourth Circuit. Member: Oklahoma Bar Association. Publication: *Stuck in the Mire: The Incomprehensible Labor Law*, 34 Okla. City U.L. Rev. 131 (2009). Experience: Research Assistant to J. William Conger, General Counsel and Distinguished Lecturer of Law, Oklahoma City University and President of the Oklahoma Bar Association (2007-08). General Counsel for Reaching Souls International (2013-2016). Mr. Wells has significant experience in complex and class action litigation in various state and federal courts, with more than a decade of experience protecting consumer and shareholder rights. Mr. Wells knows how to efficiently prosecute complex cases to conclusion and practices in areas of estate planning, probate, and guardianships for both children and adults. He is the recipient of the Federal Bar Association Pro Bono Exceptional Service Award (2019) and is a leader in his church.

PARALEGALS:

NANCY G. BEATTY. Mrs. Beatty has over thirty-five years of legal experience. She primarily works on coordinating and administering of class actions and other complex litigation. Ms. Beatty has served on several professional advisory boards in Oklahoma and Tennessee.

SHARON J. KING. Ms. King has worked in the legal community for over twenty years, after having worked in the securities and insurance industry for over fifteen years. She primarily works on insurance and civil litigation.

JANE E. ADAMS. Mrs. Adams has over 25 years of Administrative and Finance experience focusing her career on Human Resources. Additionally, she has first-hand experience with FEMA response as well as government contractual administration.

TIFFANY R. PEINTNER. Mrs. Peintner has worked in the legal community for over ten years. Before joining Federman & Sherwood, Mrs. Peintner worked in patent law, oil and gas, probate, banking and real estate, family law, personal injury and insurance defense. She works in securities and civil litigation for the firm.

FRANDELIND V. TRAYLOR. Mrs. Traylor has worked in the legal community for over fifteen years. She provides class action, securities and derivative litigation, and product liability support for the firm.

LACRISTA A. BAGLEY. Ms. Bagley has been in the legal field for twenty-one years. Before joining Federman & Sherwood, Ms. Bagley worked primarily in bankruptcy law that focused on Chapter 11's and corporate liquidations, as well as estate planning, family law, civil defense, personal injury and medical malpractice.

LAW CLERK:

TANNER R. HILTON. Education: Texas A&M University (Political Science B.S., 2019); Oklahoma City University School of Law (J.D., 2022) (Dean's List Spring of 2021; Order of the Barristers; Native American Law Student Association Moot Court Team, 2020-2022; CALI Award for Secured Transactions (2021)). Mr. Hilton graduated from Oklahoma City University School of Law in May of 2022 and will sit for the Uniform Bar Exam in February of 2023.

SELECT CASES WHERE FEDERMAN & SHERWOOD HAS SERVED AS LEAD OR CO-LEAD COUNSEL

<u>SHAREHOLDER DERIVATIVE CASES</u>	<u>COURT</u>
Abercrombie & Fitch Company	USDC Southern District of Ohio
American Superconductor Corporation	Superior Court, Commonwealth of Massachusetts
Antares Pharma, Inc.	USDC District of New Jersey
Arrowhead Research Corporation	Superior Court, State of California, County of Los Angeles
Carrier Access Corporation	USDC District of Colorado
Catalina Marketing Corporation	Chancery Court of the State of Delaware
Cell Therapeutics, Inc.	USDC Western District of Washington
Computer Associates	USDC Eastern District of New York
Delcath Systems, Inc.	USDC Southern District of New York
Dendreon Corporation	USDC Western District of Washington
Digital Turbine, Inc.	USDC Western District of Texas
Doral Financial Corporation	USDC Southern District of New York
Dynavax Technologies Corporation	Superior Court of the State of California; county of Alameda
First BanCorp.	USDC District of Puerto Rico
Flowers Foods, Inc.	USDC Middle District of Georgia
Genta, Inc.	USDC District of New Jersey
GMX Resources, Inc.	District Court of Oklahoma County, Oklahoma
Great Lakes Dredge & Dock Corporation	Circuit Court of Illinois, Dupage County Chancery Division
Host America Corporation	USDC District of Connecticut
Motricity Inc.	USDC Western District of Washington
NutraCea	Superior Court of Maricopa County, Arizona
Nuverra Environmental Solutions, Inc.	Superior Court of Maricopa County, Arizona
Nyfix, Inc.	USDC District of Connecticut
OCA, Inc.	USDC Eastern District of Louisiana
ONEOK, Inc.	District Court of Tulsa County, Oklahoma
PainCareHoldings, Inc.	USDC Middle District of Florida
Seitel, Inc.	USDC Southern District of Texas
Spectrum Pharmaceuticals, Inc.	USDC District of Nevada
The Spectranetics Corporation	USDC District of Colorado
ValueClick, Inc.	USDC Central District of California
Zix Corporation	USDC Northern District of Texas
<u>SECURITIES CLASS ACTIONS</u>	
Amyris, Inc.	USDC, Northern District of California
Bellicum Pharmaceuticals, Inc.	USDC Southern District of Texas
Broadwind Energy, Inc.	USDC Northern District of Illinois
China Valves Technology, Inc.	USDC Southern District of New York
Cryo-Cell International, Inc.	USDC Middle District of Florida
Delta Petroleum, Inc.	USDC District of Colorado
Direxion Shares ETF Trust	USDC Southern District of New York
Ener1, Inc.	USDC Southern District of New York
Exide Technologies	USDC Central District of California
Galena Biopharma, Inc.	USDC, District of New Jersey
Houston American Energy Corp.	USDC Southern District of Texas
Image Innovations Holdings, Inc.	USDC Southern District of New York
IZEA, Inc.	USDC Central District of California
Motive, Inc.	USDC Western District of Texas
Quest Energy Partners LP	USDC Western District of Oklahoma
Secure Computing Corporation	USDC Northern District of California
Superconductor Technologies, Inc.	USDC Central District of California
UTi Worldwide, Inc.	USDC Central District of California
Unistar Financial Service Corp.	USDC Northern District of Texas
<u>MDL PROCEEDINGS</u>	
In re: Anthem, Inc. (Data Breach–Participating Counsel)	USDC, Northern District of California
In re: Equifax, Inc. (Data Breach–Participating Counsel)	USDC Northern District of Georgia
In re: Farmers Insurance Co.	USDC Western District of Oklahoma
In re: Home Depot, Inc. (Executive Committee)	USDC Northern District of Georgia
In re: Mednax Services Inc. (Data Breach – Co-Lead Counsel)	USDC Southern District of Florida
In re: Premera Blue Cross (Data Breach–Participating Counsel)	USC, District of Oregon
In re: Samsung Electronics America, Inc.	USDC Western District of Oklahoma
In re: Sonic Corp.	USDC Northern District of Ohio
<u>DEAL CASES (MERGERS)</u>	
Easylink Services International Corp.	Superior Court of Gwinnett County, Georgia
Genon Energy, Inc.	Chancery Court of the State of Delaware
Lawson Software, Inc.	Chancery Court of the State of Delaware
Network Engines, Inc.	Chancery Court of the State of Delaware
Paetec Holding Corp. Shareholder Litig.	Chancery Court of the State of Delaware
Williams Pipeline Partners, L.P.	District Court of Tulsa County, Oklahoma
Xeta Technologies, Inc.	District Court of Tulsa County, Oklahoma
<u>ERISA LITIGATION</u>	
Winn-Dixie Stores	USDC Middle District of Florida

CONSUMER CLASS ACTIONS	
Altice USA, Inc. (Data Breach)	USDC Southern District of New York
Artech, LLC (Data Breach)	USDC Northern District of California
AT&T Services Inc. (Class Action)	USDC Northern District of Texas
Brinker International, Inc. (Chili's) (Data Breach)	USDC Middle District of Florida
Burgerville, LLC (Data Breach)	Circuit Court, State of Oregon, Multnomah County
CentralSquare Technologies, LLC (Data Breach)	USDC Southern District of Florida
Christie Business Holdings Company PC (Data Breach)	USDC Central District of Illinois
Dakota Growers Pasta Company, Inc. (Food Mislabeling)	USDC District of Minnesota/District of New Jersey
Filters Fast, LLC (Data Breach)	USDC Western District of Wisconsin
Hy-Vee, Inc. (Data Breach)	USDC Central District of Illinois
LeafFilterNorth, LLC/LeafFilter North of Texas, LLC (Data Breach)	USDC Western District of Texas
Lime Crime, Inc. (Data Breach)	USDC Central District of California
Medical Review Institute of America, LLC (Data Breach)	USDC District of Utah
Mednax Services, Inc. (Data Breach)	USDC Southern District of Florida
OneTouchPoint	USDC Eastern District of Wisconsin
Smile Brands (Data Breach)	USDC Central District of California
Solara Medical Supplies, LLC (Data Breach)	USDC Southern District of California
Wichita State University (Data Breach)	USDC District of Kansas
Yuma Regional Medical Center	USDC District of Arizona

EXHIBIT 3

DannLaw

Since 2008, DannLaw has represented individuals and businesses in a wide array of legal matters. The attorneys of DannLaw are established and respected trial lawyers who represent clients in simple litigation, complex litigation, appellate litigation, and class action lawsuits. DannLaw has recovered millions of dollars on behalf of thousands of individuals and businesses across the country including the states of Ohio, Illinois, Oregon, Florida, Kentucky, New Jersey and Tennessee.

Marc E. Dann

Marc Dann is the Managing Partner of DannLaw. He is also a Partner of Advocate Attorneys LLP in Washington DC. These practices focus on representing clients who have been harmed by banks, debt buyers, debt collectors and other financial predators and providing access legal services for traditionally underserved working class and middle class Americans. Dann has fought for the rights of tens of thousands of consumers and brought class actions lawsuits on behalf of clients in both private practice and as Ohio's Attorney General.

As Ohio Attorney General, Marc Dann initiated securities fraud claims against the creators of mortgage- backed securities on behalf of Ohio's public pension funds. He assembled Ohio's Organized Crime Commission to mobilize Mortgage Fraud Task Forces in Ohio's major cities to prosecute those engaged in mortgage fraud and predatory lending, Dann's office challenged the standing of mortgage servicers to foreclose in cases where the State of Ohio was a party. Dann also worked with former Ohio Supreme Court Chief Justice Thomas Moyer to organize over 1,200 volunteer lawyers to represent homeowners in foreclosure.

After leaving the Attorney General's Office, Marc Dann began representing Ohio homeowners facing foreclosure pro bono. During this time, he recognized that the issues faced by individual homeowners represented patterns of practice throughout the mortgage servicing industry. In response, he mobilized a team and created DannLaw in order to fight for the rights of Ohioans.

Since DannLaw was founded, it has grown to represent clients facing a range of consumers' rights issues including in class action. While mortgage servicing litigation practice the foundation of DannLaw, Marc Dann has developed a comprehensive collection of tools designed to help clients stay in their homes including prosecuting more than 25 Class Action cases. . He is a recognized national leader in the use of federal mortgage servicing regulations to hold servicers accountable for their actions.

Utilizing these tools has led Marc Dann to host seminars explaining these techniques to other attorneys. These working groups help to elevate the defense of clients across the nation while

allowing attorneys to recognize patterns of practice that affect all citizens.

This collaborative spirit also applies to the communities of which DannLaw is a part. Marc Dann serves on the Lakewood Ohio Tree Advisory Committee. Marc Dann and DannLaw also support the Cleveland International Film Festival each year.

Dann prioritizes professional organizations as well as being a member of the American Bar Association, the Federal Bar Association, the Cleveland Metropolitan Bar Association, the National Association of Consumer Advocates and the National Association of Consumer Bankruptcy Attorneys. He is a member of the Society of Attorneys General Emeritus and the Democratic Attorneys General Association.

Marc Dann is a regular contributor to *Attorney at Law Magazine* and the *Cleveland Metropolitan Bar Association Magazine*. His work has also been featured in *NACBA's Consumer Bankruptcy Journal* and *Legal Ink Magazine* and *Working Class Perspectives compiled by Georgetown University*.

Dann is currently acting as appointed lead counsel in two pending matters - *Madyda v. Ohio Department of Public Safety*, Ohio Court of Claims Case No. 2019-00426JD and *Miles Black, et al. v. City of Girard, Ohio, et al.*, Trumbull County Court of Common Pleas Case No. 2018 CV 1256. Dann is currently serving as Liaison Counsel in *Migliaccio, et al. v. Parker-Hannifin Corporation*, NDOH Case No. 1:22-cv-00835 as well as Liaison Counsel for the Guardians of NAS Children in *In re: National Prescription Opiate Litigation*, NDOH 17-md-02804. Dann has previously been appointed and served as lead (or co-lead) counsel in other matters including *Lieber, et al. v. Wells Fargo Bank, N.A.*, NDOH Case No. 1:16-cv-02868, *Miller, et al. v. Intelelos, Inc.*, NDOH Case No. 1:17-cv-00763, *George Koustis, et al. v. Select Portfolio Servicing*, NDOH Case No. 1:20-cv-02425 and *Ethan Ryder, et al v. Wells Fargo Bank, N.A.*, SDOH Case No. 1:2019-cv-00638. Dann is acting as putative co-counsel in other matters listed in the pending cases summary below.

Dann is admitted to practice in Ohio, the District of Columbia, the United States Court of Appeals for the Sixth Circuit, the United States Court of Appeals for the Seventh Circuit the United States Court of Appeals for the Ninth Circuit, United States District Court for the Southern District of Ohio, United States District Court for the Northern District of Ohio, United States District Court for the Northern District of Illinois, The Northern District of Indiana, The Western District of Tennessee, the United States District Court for the Western District of New York and the United States District Court for the Northern District of New York. He has pro hac vice admission in Cook County, Illinois, Washoe County Nevada, United States District Court for the Southern District of Florida, United States District Court for the Middle District of Florida, United States District Court for the Northern District of Georgia, United States District

Court in Nevada, United States District Court for the Western District of New York, United States District Court for the Southern District of New York, United States District Court for the Eastern District of New York, United States District Court for the District of New Jersey, United States District Court for the Eastern District of Pennsylvania, United States District Court for the Western District of Washington, the United States District Court for the Western District of North Carolina, and the United States District Court for the Central District of California

A native of Cleveland, Ohio, Marc Dann is a 1984 graduate of the University of Michigan, where he earned a bachelor's degree in history. He graduated from the Case Western Reserve University School of Law in 1987.

Andrew Wolf (Of Counsel)

Since opening his law practice in September 1997, Andrew Wolf, who joined DannLaw in October 2021, has become one of the most prominent, prolific, and respected consumer protection attorneys and Class Action in the United States.

Along with resolving hundreds of cases on behalf of individuals, Mr. Wolf has been certified as Class Counsel in 138 action case involving New Jersey's Consumer Fraud and Truth-in-Consumer Contract Warranty and Notice Acts, the federal Fair Debt Collection Practices Act, and other statutes. In addition to aggressively and successfully representing his clients, Andrew has generously shared his knowledge, expertise, and experience with the legal community. He taught consumer protection law to New Jersey's legal services attorneys in 2002, 2003, and from 2007 to 2013, was a featured panelist at the 2003 New Jersey State Bar Convention, the 2004 Consumer Law Day, and the 2005 New Jersey Judicial College. He has provided continuing legal instruction in the areas of consumer and class action law, served as a panelist on programs conducted by Rutgers Law School's Eric R. Neisser Public Interest Program, and was an adjunct professor at his alma mater, Rutgers University School of Law at Newark from 2013-2016 and 2018-2019.

Mr. Wolf has earned numerous honors and awards for his work on behalf of consumers. He has been designated as a SuperLawyer annually since 2014, received the Debevoise-Eakeley Award from New Jersey Legal Services in 2010 in recognition of his unparalleled support for the organization, and was the recipient of the 2018 Robert J. Cirafesi Chancery Practice Award from the Middlesex County Bar Association.

Mr. Wolf earned a bachelor's degree at Queens College (CUNY) in 1980, a Masters in Business Administration from St. John's University in 1987, and his Juris Doctorate at Rutgers University School of Law in 1995. He was admitted to practice in the state of New Jersey in 1995, the Federal District Court of New Jersey in 1996, the Third Circuit Court of Appeals in 1999, and

the United States Supreme Court in 2010.

He is a member of the National Association of Consumer Advocates (NACA), a Board Member of the Consumers League of New Jersey, the New Jersey State Bar Association, the Middlesex County Bar Association, and was appointed by the New Jersey Supreme Court to serve on the Special Civil Part Practice Committee for five terms.

He is also heavily involved in alternative dispute resolution as both a mediator and arbitrator. He is approved as a Mediator by the State of New Jersey, Department of Law and Public Safety, the State of New Jersey Judiciary, and as a Trainer in Mediation and Conciliation Skills for New Jersey's Administrative Office of the Courts.

Brian D. Flick

Mr. Flick advocates for plaintiffs and defendants nationwide in state and federal trial and appellate courts. His practice areas include Consumer Bankruptcy debtor representation in the areas of Chapter 7, 12, and 13, consumer fraud, real estate litigation, foreclosure defense, student loan debt defense, Bankruptcy Litigation, and Mortgage Servicing Litigation under the Real Estate Settlement Procedures Act and the Truth in Lending Act.

He has experience in all phases of litigation including extensive discovery, substantive motion practice, trial practice, and appellate practice. Mr. Flick has worked vigorously for over 14 years to protect the rights of consumers and to pursue recovery for plaintiffs and defendants in numerous civil matters including class actions.

Mr. Flick graduated from Adrian College with a B.A. In Political Science. He earned his law degree from the Ohio Northern University Pettit College of Law. While in law school, he received several academic awards and appeared on the Dean's List multiple times.

Since beginning the practice of law, he has been very active in local and national attorney associations. He is active with the Cincinnati Bar Association's Bankruptcy Committee. Brian also sits on the Volunteer Lawyers Committee for the Cincinnati Bar Association. He is the current Sixth Circuit Listserv Moderator for the National Association of Consumer Bankruptcy Attorneys, a position he has held since May 2017. He is the current Ohio State Chair for the National Association of Consumer Advocates, a position he has held since May 2017. He was also appointed by the Board of Trustees as a member of the Unauthorized Practice of Law Committee of the Cincinnati Bar Association, a position he has held since June 2017. Mr. Flick has been a frequent speaker at Cincinnati Bar Association, NACBA, and NACA events since 2014 as well as assisting with DannLaw's Regulation X and Z Seminars that have taken place

since 2016.

Mr. Flick is currently working as a putative co-lead counsel on several other pending matters including *Lajuan Fleetwood v. NewRez LLC*, Hamilton County Court of Common Pleas Case No. A2201533, *Patrick D. Trivison, et al. v. Federal National Mortgage Association, et al.*, NDOH 1:20-cv-00711, *Jackson, et al. v. Velocity Investments, LLC*, EDPA Case No. 20-cv-02524, and *Crews, et al. v. Titlemax of Delaware, et al.*, MDPA 1:22-cv-168. Mr. Flick was appointed co-lead counsel on *In re: Southern Ohio Health Systems Data Breach*, Hamilton County Court of Common Pleas Case No. A 2101886., *Ethan Ryder, et al v. Wells Fargo Bank, N.A.*, SDOH Case No. 1:2019-cv-00638 and worked as associate on multiple class actions that DannLaw has handled including *Ifeoma Ebo, et al. v. Wells Fargo Bank, et al.*, NDCA Case No. 3:22-cv-02535, *Lieber, et al. v. Wells Fargo Bank, N.A.*, NDOH Case No. 1:16-cv-02868, *Madyda v. Ohio Department of Public Safety*, Ohio Court of Claims Case No. 2019-00426JD and *Miles Black, et al. v. City of Girard, Ohio, et al.*, Trumbull County Court of Common Pleas Case No. 2018 CV 1256. Mr. Flick was appointed to the Interim Executive Committee in *Angus, et al. v. Flagstar Bank, FSB*, EDM Case No. 2:21-cv-1067.

Mr. Flick is admitted to the practice of law in the State of Ohio, State of Kentucky and the Federal District Courts and Bankruptcy Courts in the following jurisdictions: Southern District of Ohio; Northern District of Ohio; District of Colorado; Northern District of Illinois; Northern District of Indiana; Southern District of Indiana; Eastern District of Kentucky; Western District of Kentucky; Eastern District of Tennessee; Western District of Tennessee; Eastern District of Michigan and the Western District of Michigan. He has also been admitted *pro hac vice* in civil litigation in the following United States District Courts for either resolved or pending matters: District of Oregon, District of Nevada, Western District of North Carolina, Southern District of New York, Eastern District of Pennsylvania, Central District of California, Middle District of Florida and Southern District of Florida. He is also admitted in the United States Court of Appeals for the Sixth Circuit.

Javier Merino

Attorney Javier Merino is the managing partner of the New Jersey and New York offices of DannLaw. Mr. Merino advocates for plaintiffs and defendants nationwide in state and federal trial and appellate courts. His practice areas include Consumer Bankruptcy debtor representation in the areas of Chapter 7 and 13, consumer fraud, real estate litigation, foreclosure defense, Bankruptcy Litigation, and Mortgage Servicing Litigation under the Real Estate Settlement Procedures Act and the Truth in Lending Act.

He has experience in all phases of litigation including extensive discovery, substantive motion

practice, trial practice, and appellate practice. A licensed attorney since 2013, Mr. Merino has worked vigorously for almost nine (9) years to protect the rights of consumers and to pursue recovery for plaintiffs and defendants in numerous civil matters including class actions.

Mr. Merino graduated from Rutgers University with a B.A. In Economics in 2010. He earned his law degree from St. John's University School of Law in 2013. While in law school, he received several academic awards and appeared on the Dean's List.

Since beginning the practice of law, he has been very active in local and national attorney associations. He is active with the National Association of Consumer Advocates and the National Association of Consumer Bankruptcy Attorneys. Mr. Merino has been a frequent speaker at New Jersey State Bar Association, NACBA, and NACA events since 2017 as well as assisting with DannLaw's Regulation X and Z Seminars that have taken place since 2016. Mr. Merino most recently litigated a successful reversal of summary judgment at the United States Court of Appeals for the Second Circuit in the matter of *Kim Naimoli v. Ocwen Loan Servicing, LLC*, CA2 case number 2020-01683, a case of first impression at the Circuit Level on Regulation X of the Real Estate Settlement Procedures Act.

Mr. Merino is admitted to the practice of law in the State of New Jersey, State of New York and the Federal District Courts and Bankruptcy Courts in the following jurisdictions: District of New Jersey; Southern District of New York; Eastern District of New York; Northern District of New York; and the Western District of New York. He has also been admitted in the United States Court of Appeals for the Second Circuit and the United States Court of Appeals for the Third Circuit.

Michael A. Smith, Jr.

Michael Smith is a graduate of the Ohio State University and the University of Georgia School of Law. Mr. Smith is admitted to practice in the State of Ohio, State of New Jersey, United States District Court for the Northern and Southern Districts of Ohio, and United States District Court for the District of New Jersey.

Mr. Smith represents consumers in class actions involving unfair and deceptive trade practices, privacy violations, antitrust matters, and defective products. Smith has been active in federal litigation, including class action litigation in the state and federal courts of Ohio and New Jersey.

Mr. Smith has worked as associate counsel in many class actions the firm has handled including *Lieber, et al. v. Wells Fargo Bank, N.A.*, NDOH Case No. 1:16-cv-02868, *Koustis, et al. v. Select Portfolio Servicing, Inc.*, NDOH Case No. 1:20-cv-02425-DAP, *In re: Sonic Corp. Customer*

Data Security Breach, NDOH Case No. 17-md-2807, *In re: National Prescription Opiate Litigation*, NDOH Case No. 17-md-02804, *Madyda v. Ohio Department of Public Safety*, Ohio Court of Claims Case No. 2019-00426JD, and *Miles Black, et al. v. City of Girard, Ohio, et al.*, Trumbull County Court of Common Pleas Case No. 2018 CV 125.

Emily White

After spending nearly a decade as a public interest attorney, Emily White joined DannLaw. She is the Managing Partner of the firm's Columbus, Ohio office where she practices student loan debt, disability rights, Class Action and consumer law.

Emily received her law degree from the City University of New York School of Law, where she served on the editorial board of the New York City Law Review. Following law school, she served for two years as a judicial law clerk to the Honorable Sylvia H. Rambo, U.S. District Court Judge for the Middle District of Pennsylvania.

In 2009 she joined the Legal Aid Society of Cleveland, where she represented low-income consumers during the historic recession and foreclosure crisis. While at Legal Aid she authored a chapter of Ohio Consumer Law focused on student loans and helped student loan borrowers resolve defaults and apply for student loan discharges.

In 2013 she joined Disability Rights Ohio as a staff attorney. In that role Emily represented individuals with disabilities in employment and higher education matters and offered advice about issues related to student loans and vocational rehabilitation services.

Emily received an undergraduate degree in Philosophy from the University of Illinois at Urbana-Champaign. Before attending law school she served as an AmeriCorps volunteer with Habitat for Humanity NYC.

Dan Solar

Attorney Dan Solar has brought consumer cases against loan modification mills and financial institutions, won motions to vacate older foreclosure judgments on behalf of DannLaw clients, and unearthed significant evidence of fraud and robo-signing via the legal discovery process.

A licensed attorney since 2009, Dan earned a B.A. in Political Science from Denison University in 2006 and a J.D. from the University of Akron School of Law in 2009. He served an internship at the Cuyahoga County Public Defender's Office and during his years in law school worked as a law clerk for a firm in Akron, Ohio where he focused on a variety of tort matters and insurance

litigation.

In addition to his extensive legal training, Attorney Solar's experience in the origination of mortgage loans gives him a specialized, in-depth and invaluable knowledge of every facet of the mortgage lending process.

Attorney Solar is admitted to practice in the State of Ohio, the United States District Courts for the Northern and Southern Districts of Ohio, and the Eleventh Circuit Court of Appeals.

REPRESENTATIVE CLASS ACTIONS CASES

Completed Cases:

In re: Southern Ohio Health Systems Data Breach, Hamilton County Court of Common Pleas Case No. A 2101886. \$1.95 Million recovery for a nationwide class of 420,433 persons whose personal financial information and/or personal health information was stolen as part of a data breach.

Ryder et al v. Wells Fargo United States District Court for the Southern District of Ohio Case No. 19-cv-00638. \$ 12 Million recovery for borrowers who were denied loan modifications as a result of a computer software error.

Koustis, et al. v. Select Portfolio Servicing, Inc., 1:20-cv-02425-DAP NDOH (Final Approval Order and Judgment entered 12/08/2021) - \$184,000.00 recovery for a nationwide class of borrowers whose lender failed to properly respond to qualified written requests, requests for information, and/or notices of error because of an improper active litigation, active mediation, or active bankruptcy exception.

In re Sonic Corp. Customer Data Security Breach, 1:17-md-2807 NDOH (Order granting Plaintiffs' Unanimous and Unopposed Motion to Appoint Attorney William B. Federman as Interim Lead Counsel, Attorney Marc Dann as Interim Liaison Counsel, and Attorneys Thomas A. Zimmerman, Jr., Michael R. Fuller, Melissa R. Emert and Miles Clark as Plaintiffs' Steering Committee signed 01/03/2018) - Class action for a nationwide class of individuals who had their personal and financial data stolen due to insufficient protection of that information by a retailer.

Miller et al. v. Inteleos, Inc., Case No. 1:17-cv-00763-DAP NDOH - \$570,000 recovery for a nationwide class of sonographers who took and passed a certification examination but the testing agency improperly scored their results and falsely reported that they failed the examination.

Lieber v. Wells Fargo Bank, N.A., Case No. 1:16-cv-02868-PAG NDOH - \$425,000 recovery for a nationwide class of borrowers whose lender failed to properly respond to qualified written requests, requests for information, and/or notices of error because of an improper active litigation, active mediation, or active bankruptcy exception.

Clark, et al. v. Lender Processing Services, Inc, et al., Case No. 2:12-cv-02187 NDOH

Hlavasa, et al. v. Bank of America, et al., Case No. 2:2011-cv-00530 NDOH

Turner, et al. v. Lerner, Sampson & Rothfuss, Case No. 1:11-cv-00056 NDOH

Andrew R. Wolf, of Counsel to DannLaw has been certified as class counsel individually in the following cases as of January 2022:

1. Mathis v. Hillside Auto Mall, Inc., et al.
Docket No. UNN-L-5674-01 (Superior Court of New Jersey, Union County)
2. United Consumer Financial Services Co. v. Carbo
Docket No. HUD-L-3438-02 (Superior Court of New Jersey, Hudson County)
3. Wilson v. Burt, et al.
Docket No. MER-L-1947-03 (Superior Court of New Jersey, Mercer County)
4. Wilson v. AutoNation, et al.
Docket No. MID- L-1319-04 (Superior Court of New Jersey, Middlesex County)
5. Galatis v. Psak, Graziano, Piasecki & Whitelaw, et al.
Docket No. MID-L-5900-04 (Superior Court of New Jersey, Middlesex County)
6. Moreno v. Lawrence Lincoln-Mercury, Inc.
Docket No. MID-L-2869-02 (Superior Court of New Jersey, Middlesex County)
7. Muller-Moreno, et. al. v. Malouf, et. al.
Docket No. MID-L-4464-02 (Superior Court of New Jersey, Middlesex County)
8. Romano and Smerling v. Dayton Auto Center, et al.
Docket No. MID-L-5176-02 (Superior Court of New Jersey, Middlesex County)
9. Losgar v. Freehold Chevrolet, Inc.
Docket No. MON-L-3145-02 (Superior Court of New Jersey, Monmouth County)
10. Davis v. Liccardi, et al.
Docket No. UNN-L-001546-03 (Superior Court of New Jersey, Union County)
11. Wenger, John v. East Brunswick Buick Pontiac GMC etc.
Docket No. MID-L-5617-03 (Superior Court of New Jersey, Middlesex County)
12. Arteaga v. Moda Furniture, et al.
Docket No. MRS-L000980-05 (Superior Court of New Jersey, Morris County)

13. Barrood v. IBM
Docket No. MER-L-0843-98 (Superior Court of New Jersey, Mercer County)
14. Robilotti v. Garden Irrigation et al.
Docket No. MON-L-002147-03 (Superior Court of New Jersey, Monmouth County)
15. Valley National Bank v. Jeffery Cahn
Docket No. MER-L-0504-04 (Superior Court of New Jersey, Mercer County)
16. Grandberry and Deloatch v. Pressler & Pressler
Docket No. MID-L-001356-06 (Superior Court of New Jersey, Middlesex County)
17. Hudson United Bank v. Wendy D. Chase
Docket No. HNT-L-37-04 (Superior Court of New Jersey, Hunterdon County)
18. DeBenedetto vs. Del Monte Corporation, et al.
Docket No. MID-L-003163-06 (Superior Court of New Jersey, Middlesex County)
19. Nthenge, et al. v. Pessler and Pressler, et al.
Docket No. MID-L-001363-06 (Superior Court of New Jersey, Middlesex County)
20. Estep v. Smythe Volvo, Inc., et al.
Docket No. UNN- L-004184-03 (Superior Court of New Jersey, Union County)
21. Miller, Jennifer, et al v. CVS Corporation
Docket No. MID-L-003855-06 (Superior Court of New Jersey, Middlesex County)
22. Fisher, Samuel v. Walgreen Co. et al.
Docket No. MID-L-004090-06 (Superior Court of New Jersey, Middlesex County)
23. Picket v. Triad, et al.
Docket No. MID- L-007727-05 (Superior Court of New Jersey, Middlesex County)
24. Clemons & Jordan vs. Donna Thompson, Esq.
Docket No. MON-L-001980-07 (Superior Court of New Jersey, Monmouth County)
25. Fisher v. Hallmark Marketing Corporation et al.
Docket No. MID-L-6465-06 (Superior Court of New Jersey, Middlesex County)
26. Wells v. DTD Enterprises, Inc.
Docket No. MID-L-9012-07 (Superior Court of New Jersey, Middlesex County)
27. Bessie Brown v. Hayt, Hayt & Landau, LLC
Docket No. ESX-L-7042-07 (Superior Court of New Jersey, Essex County)

28. Miller v. Weltman, Weinberg & Reis, Co., L.P.A.
Docket No. MID-L-6248-07 (Superior Court of New Jersey, Middlesex County)
29. Santos & Velez v. Samuel Silver, Esq. et al
Docket No. MID-L-08188-07 (Superior Court of New Jersey, Middlesex County)
30. Cruz, Romeo R. v. Condor Capital Corp.
Docket No. MID-L-2108-06 (Superior Court of New Jersey, Middlesex County)
31. Walker, Michael v. Hill Wallack LLP
Docket No. MID-L-003480-08 (Superior Court of New Jersey, Middlesex County)
32. Portfolio Recovery Associates, LLC v. Patricia M. Barnes, et al
Docket No. MID-L-009791-06 (Superior Court of New Jersey, Middlesex County)
33. Debra Smerling & Sheila Smerling v. Harrah's Entertainment Inc.
Docket No. MID-L-008733-04 (Superior Court of New Jersey, Middlesex County)
34. Moore, William v. NCO Financial Systems Inc. consolidated with
Meekins, Elizabeth v. NCO Financial Systems Inc.
Case # 2:08-CV-01936-JAG-MCA (Federal District Court of New Jersey)
35. Wenger, Christopher & Jennifer. vs. Cardo Windows, Inc. et al
Docket No.: MID-L-4924-07 (Superior Court of New Jersey, Middlesex County)
36. The Provident Bank v. Patricia Deprospo
Docket No.: UNN-L-1393-09 (Superior Court of New Jersey, Union County)
37. Parkin, Nicole v. Bank of America, N.A.
Docket No. MID-L-8170-07 (Superior Court of New Jersey, Middlesex County)
38. Mohrle, Dawn v. Timco, Inc. d/b/a Planet Honda
Docket No. UNN-L- 000953-08 (Superior Court of New Jersey, Union County)
39. Quinonnes-Malone, Carmen v. Pellegrino & Feldstein, L.L.C., et al
Case # 2:08-cv-03295-JAG-MCA (Federal District Court of New Jersey)
40. Kho, Ernesto vs. Nationwide Home Relief, LLC
Docket No. MID-L-4245-09(Superior Court of New Jersey, Middlesex County)
41. Peabody, Gail v. Legal Loan Modifications, Inc., et al
Docket No. MID-L-6981-09 (Superior Court of New Jersey, Middlesex County)
42. Coleman, Lori and Henry, Jahod v. Edison Auto Sales, Inc. et al

Docket No. MID-L-8168-09 (Superior Court of New Jersey, Middlesex County)

43. Wenger, Christopher vs. Freehold Subaru, LLC et al.

Docket No. MON-L-4003-10 (Superior Court of New Jersey, Monmouth County)

44. Richardson vs. Allied Interstate, Inc., et al.

Case No. 09-2265-MLC-DEA (Federal District Court of New Jersey)

45. Kim Robinson and Jacob Robinson v. Donna L. Thompson

Case No. 3:10-cv-04143-JAP-TJB (Federal District Court of New Jersey)

46. Mark Epstein & Mira Epstein v. Sears Roebuck & Co., Inc.

Docket No. UNN-L-1732-09 (Superior Court of New Jersey, Union County)

47. Elaine Drake v. Wells Fargo Bank, N.A.

Docket No. MID-L-4177-09 (Superior Court of New Jersey, Middlesex County)

48. Dipopolo & Kawajian v. Ramsey Nissan, Inc.

Docket No. BER-L-10319-09 (Superior Court of New Jersey, Bergen County)

49. John Tortora v. Guardian Protective Services, et al.

Docket No. MID-L-1041-10 (Superior Court of New Jersey, Middlesex County)

50. Te, Montesclaro, & Te v. Thrift Investment Corporation, et al.

Docket No. MID-L-2061-10 (Superior Court of New Jersey, Middlesex County)

51. Berger, Garrett and Kelter, Bonny vs. PCUSA Corporation

Docket No. MID-L-3211-11 (Superior Court of New Jersey, Middlesex County)

52. Pollitt vs. DRS Towing, LLC

Case No. 3:10-cv-01285 (Federal District Court of New Jersey)

53. Sheikh/Sheikh vs. Maxon Hyundai, et al

Docket No. UNN- L-000476-09 (Superior Court of New Jersey, Union County)

54. Bosland, Rhonda v. Warnock Dodge, Inc. et al

Docket No. MRS- L-844-06 (Superior Court of New Jersey, Morris County)

55. Martell, Rhonda v. Warnock Dodge, Inc. et al

Docket No. MRS- L-1085-09 (Superior Court of New Jersey, Morris County)

56. Alper, Todd v. Warnock Motor Sales, Inc. d/b/a/ Warnock Ford, et al

Docket No. MRS- L-1640-10 (Superior Court of New Jersey, Morris County)

57. Richard R. Froumy and Victoria M. Carr v. Stark & Stark, et al
Case No. 3:09-CV-4890-LHG (Federal District Court of New Jersey)
58. Pollitt v. Wachovia Dealer Services, Inc., et al
Case No. 3:10-cv-01285-DEA (Federal District Court of New Jersey)
59. Chulsky v. Hudson Law Offices, P.C., et al
Case No. 3:10-CV-03058-LHG (Federal District Court of New Jersey)
60. Williams v. The CBE Group, et al
Case No. 2:11-cv-3680-PS (Federal District Court of New Jersey)
61. Petersen, Daniel vs. Central Jersey Pool & Supply Co., Inc., et al.
Docket No. MON-L-4044-11 (Superior Court of New Jersey, Monmouth County)
62. Eisenberger, Ruth vs. Boston Service Co., Inc. d/b/a Hann Financial Svc. Corp.
Docket No. MID-L-10366-09 (Superior Court of New Jersey, Middlesex County)
63. Lileikyte, Asta vs. Bergen Auto Eenterprises, LLC d/b/a Wayne Mazda
Docket No. MID-L-6222-10 (Superior Court of New Jersey, Middlesex County)
64. Lippert, Tammy vs. Edison Motor Cars, Inc. d/b/a Brad Benson Mitsubishi/Hyundai
Docket No. MID-L-6599-10 (Superior Court of New Jersey, Middlesex County)
65. Diop, Aissatou vs. I.C. Systems, Inc.
Docket No. MID-L-1062-11 (Superior Court of New Jersey, Middlesex County)
66. Bush, Tanya vs. Renovo Services, LLC, et als.
Docket No. MID-L-5132-10 (Superior Court of New Jersey, Middlesex County)
67. Avalishvili, Zhanetta vs. Reussille Law Firm, LLC, et al
Case No. 3:12-cv-02772-TJB (Federal District Court of New Jersey)
68. Martina, Sophia vs. LA Fitness International, LLC
Case No. 2:12-cv-02063-WHW (Federal District Court of New Jersey)
69. Korrow, Margaret vs. Aaron's, Inc., et al.
Case No. 3:10-cv-6317-MAS (Federal District Court of New Jersey)
70. Hernandez, Rodolfo vs. Enhanced Recovery Company, LLC, et al.
Docket No. MID-L-2640-12 (Superior Court of New Jersey, Middlesex County)
71. Walker, Michael vs. Cutolo Law Firm, LLC, et al.
Docket No. MID-L-7498-11 (Superior Court of New Jersey, Middlesex County)

72. Mukoma, Stephen vs. Fleet Lease Network, Inc.
Docket No. HUD-L-2707-12 (Superior Court of New Jersey, Hudson County)
73. Wenger, Christopher D. vs. South Brunswick Furniture, Inc., etc., et al
Docket No. MID-L-000479-12 (Superior Court of New Jersey, Middlesex County)
74. Katz, et al. vs. Live Nation, Inc., et al.
Case No. 09-cv-03740-DEA (Federal District Court of New Jersey)
75. Blaine, Joanne vs. Pressler & Pressler, LLP
Docket No. MID-L-583-11 (Superior Court of New Jersey, Middlesex County)
76. Davis, Ollie vs. First Financial Federal Credit Union, et al.
Docket No. MON-L-4493-11 (Superior Court of New Jersey, Monmouth County)
77. Khweye, Uz C./Rivera, Pura vs. Leaders Financial Company, et al.
Docket No. ESX-L-5584-10 (Superior Court of New Jersey, Essex County)
78. Khweye, Uz C. vs. Mullooly, Jeffrey, Rooney & Flynn, LLP
Docket No. ESX-L-5585-10 (Superior Court of New Jersey, Essex County)
79. Gordon, Ella and Martha vs. Feinstein, Raiss, Kelin & Booker, LLC
Case No. 3:13-cv-00089-MAS (Federal District Court of New Jersey)
80. Robinson, Shaquanna vs. J & C Auto Outlet, LLC
Docket No. MID-L-1961-13 (Superior Court of New Jersey, Middlesex County)
81. Allen, Stacy vs. National Auto Outlet
Docket No. MID-L-004905-13 (Superior Court of New Jersey, Middlesex County)
82. Willis, Laura vs. Galleria Route One Corporation, et al.
Docket No. MID-L-001315-12 (Superior Court of New Jersey, Middlesex County)
83. Fonville, Shanique vs. Clover Commercial Corporation, et al.
Docket No. UNN-L-000563-13 (Superior Court of New Jersey, Union County)
84. Caruso, Jerry/Brady, Sandra v. WOW, et als.
Docket No. MID-L-3112-13 (Superior Court of New Jersey, Middlesex County)
85. Fonville, Shanique and Nekisha vs. Schwartz Barkin & Mitchell, et al.
Docket No. UNN-L-001097-13 (Superior Court of New Jersey, Union County)
86. Malangone, Dolores v. Izzy's Inc. etc., et al.
Docket No. OCN-L-515-13 (Superior Court of New Jersey, Ocean County)

87. Ortiz-Rodriguez, Norma vs. Pressler & Pressler, LLP
Docket No. MID-L-007253-13 (Superior Court of New Jersey, Middlesex County)
88. Norris, Michael/Tatem, Christopher vs. Bill Me Later, Inc. & Eichenbaum and Stylianou, LLC
Docket No. MID-L-002364-15 (Superior Court of New Jersey, Middlesex County)
89. Gambrell, Eugene & Doris and Patel, Falguni vs. Hess Corporation, Inc.
Docket No. MID-L-7761-12 (Superior Court of New Jersey, Middlesex County)
90. Lechtrecker, Joshua vs. Pressler & Pressler, LLP
Docket No. MID-L-001933-15 (Superior Court of New Jersey, Middlesex County)
91. The Estate of Theresa Torsiello by Vincent Torsiello Executor vs. McGovern Legal Services, LLC
Case No. 3:14-cv-03814-DEA (Federal District Court of New Jersey)
92. Tirado, Ricardo vs. Deluxe Auto Group, LLC, et al.
Docket No. HUD-L-1069-14 (Superior Court of New Jersey, Hudson County)
93. Bowman, Lethrop vs. Lyons, Doughty & Veldhuis, P.C.
Docket No. MID-L-4474-14 (Superior Court of New Jersey, Middlesex County)
94. Celario, Michael vs. Route 22 Nissan, Inc.
Docket No. MID-L-000260-14 (Superior Court of New Jersey, Middlesex County)
95. McKenzie, Yusef vs. New City Funding Corp.
Docket No. MID-L-1952-14 (Superior Court of New Jersey, Middlesex County)
96. Thorne, Kimberly vs. Live Nation, Entertainment Inc.
Case No. 3:09-cv-03740-DEA (Federal District Court of New Jersey)
97. Pabon/Alvarado vs. Metro Auto Exchange
Docket No. UNN-L-1426-14 (Superior Court of New Jersey, Union County)
98. Rufo, Melissa vs. Alpha Recovery Corp.
Case No. 2:15-cv-0865-SRC (Federal District Court of New Jersey)
99. Politi, Andrew v. Pressler & Pressler, LLP, etc.
Docket No. MID-L-7273-15 (Superior Court of New Jersey, Middlesex County)
100. Nunez, Angel and Eve vs. Donna L. Thompson, Esq.
Docket No. MID-L-00949-15 (Superior Court of New Jersey, Middlesex County)
101. Nepomuceno, Luzvimid vs. Midland Management, Inc.

Case No. 2:14-cv-5719-SDW-SCM (Federal District Court of New Jersey)

102. Stepien, Lisa vs. PNC Financial Services Group, Inc.
Docket No. MID-L-2837-13 (Superior Court of New Jersey, Middlesex County)
103. Politi, Alexa vs. Gil Vigneault, et al.
Case No. 3:15-cv-04425-DEA (Federal District Court of New Jersey)
104. Javan, John vs. LVNV Funding, LLC, et al.
Docket No. MID-L-001866-16 (Superior Court of New Jersey, Middlesex County)
105. Vizthum, Tracy vs. Maguire East Windsor, LLC d/b/a Windsor Nissan
Docket No. MID-L-284-15 (Superior Court of New Jersey, Middlesex County)
106. Qureshi v. OPS 9, LLC
Case No. 2:14-cv-01806 (Federal District Court of New Jersey)
107. Mohammed v. Faloni Association
Docket No. MID-L-7880-13 (Superior Court of New Jersey, Middlesex County)
108. Shumaker v. Vengroff
Docket No. MID-L-5367-15 (Superior Court of New Jersey, Middlesex County)
109. Gomes v. Extra Space Storage, Inc.
Case No. 2:13-cv-929-KSH (Federal District Court of New Jersey)
110. Sefarian v. Carmadella et al.
Docket No. MID-L-005333-15 (Superior Court of New Jersey, Middlesex County)
111. Chung v. Northland Group Inc
Case No. 2:15-cv-06246 (Federal District Court of New Jersey)
112. Chung v. AllianceOne Capital
Case No. 2:15-cv-02905 (Federal District Court of New Jersey)
113. Raff v. Safavieh Livingston LLC
Docket No. ESX-L-2017-15 (Superior Court of New Jersey, Essex County)
114. Guillen v. AAA Limo and Luxury Car Services of East Brunswick
Docket No. MID-L-002661-16 (Superior Court of New Jersey, Middlesex County)
115. Kendall v. Cubesmart L.P., et al.
Case No. 3:15-cv-06098 (Federal District Court of New Jersey)
116. Santiago v. Northland Group Inc.

Case No. 2:15-cv-03608-CLW (Federal District Court of New Jersey)

117. Giulanelli v. Fredco Landscaping LLC
Docket No. ESX-L-004202-16 (Superior Court of New Jersey, Essex County)
118. Seigelstein v. Shrewsbury Motor, Inc. et al.
Docket No. MON-L-4072-15 (Superior Court of New Jersey, Monmouth County)
119. Park v. United Collection Bureau, Inc.
Case No. 2:15-cv-01306 (Federal Court of New Jersey)
120. Watkins v. Pressler & Pressler, LLC
Case No. 2:16-cv-00119-MCA-LDW (Federal District Court of New Jersey)
121. Harris v. General Motors Financial Co. Inc.
Docket No. MID-L-3170-15 (Superior Court of New Jersey, Middlesex County)
122. Shirey v. Project One Autosports LLC
Docket No. ESX-L-006233-16 (Superior Court of New Jersey, Essex County)
123. Sparks v. Service Finance Co., LLC
Docket No. MID-L-2441-17 (Superior Court of New Jersey, Middlesex County)
124. Labidou v. Fleet Lease Network, Inc.
Docket No. HUD-L-5191-15 (Superior Court of New Jersey, Hudson County)
125. Best v. Twin, Inc.
Docket No. ESX-L-8062-16 (Superior Court of New Jersey, Essex County)
126. Patterson v. Volkswagen Credit
Docket No. MID-L-6498-16 (Superior Court of New Jersey, Middlesex County)
127. Bonilla v. Pike Run II LLC
Docket No. MID-L-3986-17 (Superior Court of New Jersey, Middlesex County)
128. Martins v. Signature Pre-Owned LLC et al.
Docket No. HUD-L-3596-17 (Superior Court of New Jersey, Hudson County)
129. Thomas v. Hudson Valley Federal Credit Union
Docket No. ESX-L-8205-18 (Superior Court of New Jersey, Essex County)
130. Gonzalez v. New Century Financial Services Inc.
Docket No. ESX-L-00765-17 (Superior Court of New Jersey, Essex County)
131. McMillin v. The Traf Group Inc.

Case No. 3:18-cv-01734-DEA (Federal District Court of New Jersey)

132. Santiago v. Apothaker Scian P.C. et al.

Case No. 2:16-cv-01432-CCC-SMC (Federal District Court of New Jersey)

133. Pierre-Charles v. Consumer Portfolio Services, Inc.

Case No. 3:17-cv-10025-DEA (Federal District Court of New Jersey)

134. Deltoro v. City Select Auto Sales, Inc.

Docket BUR-L-00709-19 (Superior Court of New Jersey, Burlington County)

135. Mills v. Camping World RV et al.

Case No. 3:18-cv-02283-MAS-TJB (Federal District Court of New Jersey)

136. Browne v. Capital One Bank USA et al.

Docket No MID-L-05583-15 (Superior Court of New Jersey, Middlesex County)

137. Wares v. Guaranteed Motor Towing Service Inc. et al.

Docket No. MID-L-002088-16 (Superior Court of New Jersey, Middlesex County)

138. Roach v. BM Motoring LLC

Docket No. MID-L-001333-13 (Superior Court of New Jersey, Middlesex County)

139. Davis v. Omnisure

Docket No. CAM-L-3742-15 (Superior Court of New Jersey, Camden County)

Pending Cases:

RESPA and Mortgage Servicing Class Action

- DannLaw is putative class co-counsel in *Trivison, et al. v. Federal National Mortgage Association*, United States District Court for the Northern District of Ohio Case No. 20-cv-00711.
- DannLaw is putative class co-counsel in *Lajuan Fleetwood v. NewRez LLC*, Hamilton County Court of Common Pleas Case No. A2201533.
- DannLaw is putative class co-counsel in *Kathryn Forest, et al. v. PHH Mortgage Corporation, et al.*, United States District Court for the District of Rhode Island, Case No. 1:20-cv-00323.
- DannLaw is putative class counsel in *Elaine M. Johnson, et al. v. loanDepot.com LLC*, United States District Court for the Northern District of Ohio Case No. 5:22-cv-00641.
- DannLaw is putative class co-counsel in *Schmitt v. Security National Servicing Corporation*, United States District Court for the Northern District of Ohio Case No. 1:21-cv-01188.

Constitutional Violations

- DannLaw is putative co-counsel in *The State of Ohio, ex rel James Parker, et al. v. The Ohio Department of Job and Family Services, et al.*, Franklin County Court of Common Pleas 21 CV 00524.
- DannLaw is putative class co-counsel in *Tarrify Properties, LLC, et al. v. Cuyahoga County, Ohio, et al.*, United States District Court for the Northern District of Ohio Case No. 19-cv-02293.
- DannLaw is putative class co-counsel in *Alana Harrison, et al. v. Montgomery County, Ohio, et al.*, United States District Court for the Southern District of Ohio Case No. 3:19-cv-00288.
- DannLaw is putative class co-counsel in *Madyda v. Ohio Department of Public Safety*, Ohio Court of Claims Case No. 2019-00426JD.
- DannLaw is putative class co-counsel in *Miles Black, et al. v. City of Girard, Ohio, et al.*, Trumbull County Court of Common Pleas Case No. 2018 CV 1256.

Data Breach/Misuse of Consumer Information -

- DannLaw has been appointed as co-lead in *Desiree Schmitt, et al. v. SN Servicing Corporation*, United States District Court for the Northern District of California, Case No. 21-cv-03355.
- DannLaw has been appointed on the Plaintiff's Executive Committee in *Angus, et al. v. Flagstar Bank, FSB*, United States District Court for the Eastern District of Michigan Case No. 21-cv-10657.
- DannLaw has been appointed as Interim Class Co-Counsel in *Acker, et al. v. ProTech Solutions Inc.*, United States District Court for the Eastern District of Arkansas Case No. 20-cv-00852.
- DannLaw is co-counseling a Class Action for a nationwide class and statewide classes of consumers who were subject to unauthorized automatic payment drafts. DannLaw brought two of the eight lawsuits related to this incident - *Dwayne Friday, et al. v. Nationstar Mortgage, LLC*, United States District Court of the Western District of North Carolina Case No. 1:21-cv-165 and *LaTreece Jones, et al. v. Nationstar Mortgage, LLC*, United States District Court for the Northern District of Illinois Case No. 1:21-cv-3217. All cases are pending settlement and consolidation.
- DannLaw has been appointed Interim Liaison Counsel for a nationwide class and statewide classes of employees and unknown third parties who were victims of a data breach in *Migliaccio, et al. v. Parker-Hannifin Corporation*, United States District Court for the Northern District of Ohio Case No. 1:22-cv-00835.

- DannLaw is co-counseling a Class Action for a nationwide class and statewide classes of employees and patients who were victims of a data breach in *In re: Southern Ohio Health Systems Data Breach*, Hamilton County Court of Common Pleas Case No. A 2101886.
- DannLaw is co-counseling a Class Action for a nationwide class and statewide classes of consumers who were subject to a data breach involving their mortgage servicer in *Morrill v. Lakeview Loan Servicing, LLC, et al.*, United States District Court for the Southern District of Florida Case No. 1:22-cv-20955-DPG.
- DannLaw is local counsel in *Finesse Express, LLC, et al. v. Total Quality Logistics, LLC*, United States District Court for the Southern District of Ohio, Case No. 1:20-cv-00235.

Consumer Class Actions

- DannLaw is putative class co-counsel in *Jackson, et al. v. Velocity Investments, LLC*, United States District Court for the Eastern District of Pennsylvania Case No. 5:20-cv-02524.
- DannLaw is putative class co-counsel in *Crews, et al. v. Titlemax of Delaware, et al.*, United States District Court for the Middle District of Pennsylvania Case No. 1:22-cv-168.

Products Liability

- DannLaw is co-counseling as Local Counsel *Erica Parks, et al. v. The Proctor & Gamble Company*, United States District Court for the Southern District of Ohio Case No. 1:21-cv-00258.
- DannLaw is putative co-counsel in *Tyneshia Ferguson, et al. v. The J.M. Smucker Company*, United States District Court for the Eastern District of Kentucky Case No. 5:22-cv-00173.
- DannLaw is putative co-counsel in *Pisciotti, et al. v. The J.M. Smucker Company*, United States District Court for the Northern District of Ohio Case No. 5:22-cv-01151.

Shareholder Derivative Suit

- DannLaw is co-counseling as Local Counsel a Shareholder Derivative Complaint against a multi-state Managed Care facility. The matter has not proceeded to Class Certification.

EXHIBIT 4

**PARSONS
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LATIMER**

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CHARLES H. THRONSON

Senior Shareholder

BIOGRAPHY

Charles Thronson is the senior active shareholder at Parsons Behle & Latimer and head of the Personal Injury/Medical Malpractice Division. He has over 40 years of experience and practices throughout the United States in the areas of medical malpractice (especially birth injury cases), whistleblower (Qui Tam), personal injury, sexual assault and products liability cases. Mr. Thronson has been involved in a number of cases for personal injury and medical malpractice clients that have generated some of the largest verdicts and settlements in the region.

Major verdicts include the largest personal injury/medical malpractice verdict in the state's history (2015 - \$11,268,178) in a medical malpractice brain injury case.

He has been an Adjunct Professor of Law at the S.J. Quinney School of Law at the University of Utah, an Adjunct Professor at Westminster College, a long-time member of the Utah Association for Justice (president, 2009-2010) and a frequent lecturer. He is listed in the *Top 100 Lawyers in Utah*, *Mountain States Super Lawyers* and he has been recognized since 1995 in *The Best Lawyers in America* (2012, 2016 Plaintiffs' Lawyer of the Year -- Medical Malpractice (Salt Lake City); 2019 Lawyer of the Year -- Personal Injury Litigation - Plaintiffs (Salt Lake City)). He was named 2020 Best Lawyers in America "Best of the Best" and 2021 National Alliance of Attorneys - Attorney of the Year - Personal Injury.

ACCOMPLISHMENTS

Academic

Harvard University - Post Graduate (Fundamentals of Neuroscience, 2021)

Creighton University (J.D., *magna cum laude*, 1977)
(ranked 3rd in class of 172)

Editorial Staff, *Creighton University Law Review*

University of Washington (B.A., 1972)

Major: Business Administration

Athletics: Freshman and Varsity Crew



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cthronson@parsonsbehle.com

PRACTICE AREAS

Medical Malpractice, Birth Injury
& Hospital Negligence

Mass Torts

Plaintiffs Personal Injury

Product Liability Risk Management

Whistleblower (Qui Tam) Cases

Data Breach

Sexual Assault

Defective Products

LICENSED/ADMITTED

U.S. Court of Federal Claims

U.S. Dist. Court, Dist. of Utah

Utah

CHARLES H. THRONSON • PARSONS BEHLE & LATIMER

Adjunct Professor, Advanced Torts Practice, University of Utah, College of Law, 1999 - 2003

Adjunct Professor, Westminster College, 1986 - 1988

Professional

Listed in *Best Lawyers in America* (1995 - present) in Medical Malpractice, Litigation, and Personal Injury Litigation

Selected as a 2020 Top Rated Lawyer in Medical Malpractice Law by Corporate Counsel and The American Lawyer magazines

Selected to Association of American Trial Lawyers' (AOATL) Top 100 attorneys in Utah

Selected in 2015 as a member of the Nation's Top One Percent by the National Association of Distinguished Counsel

Named ACQ Law Awards Utah Leading Lawyer of the Year, 2013 - 2020, U.S. Leading Lawyer of the Year, 2019 and 2020, Personal Injury

CV Magazine's 2019 Corporate Excellence Awards, Most Influential Personal Injury Lawyer of 2019 - Utah

Named *Best Lawyers'* 2012, 2016 Plaintiffs' Lawyer of the Year for Salt Lake City in Medical Malpractice Law

Named *Best Lawyers'* 2019 Plaintiffs' Lawyer of the Year for Salt Lake City in Personal Injury

Named Best Lawyers' 2020 "Best of the Best"

National Academy of Personal Injury Attorneys Top 10 Attorney Award (Utah 2015)

Named 2021 National Alliance of Attorneys - Attorneys of the Year - Personal Injury

Listed as one of the Top Lawyers Named by Their Peers, 2012

Listed in *Mountain States Super Lawyers*

Listed in *Top 100 Lawyers in Utah*

Listed in Utah's Legal Elite

Martindale-Hubbell AV® Preeminent™ Rating

Listed in "10 Best Attorneys," 2019 and 2021 for Utah, American Institute of Personal Injury Attorneys

Selected as a 2020 Top Rated Litigation Lawyer by ALM Media and Martindale-Hubbell

Selected to Lawyers of Distinction, 2021

2021 National Trial Lawyers Top 100 Lawyers in Utah

ASSOCIATIONS

Professional

Utah Association for Justice, Board of Governors (2004 - present), President (2009 - 2010)

Alpha Sigma Nu National Academic Honor Society

National Association of Distinguished Counsel

Litigation Counsel of America, Founding Fellow

Utah State Bar, Bar Examiner (1986 - 2009)

Utah State Division of Occupational and Professional Licensing, Prelitigation Task Force (1995 - 1997)

American Association for Justice, Member

Salt Lake County Bar Association, Member

American Bar Association, Member

Judge Memorial High School, Board of Directors (2007 - 2014)

Utah State Bar: Litigation Section, Member

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CHARLES H. THRONSON • PARSONS BEHLE & LATIMER**Community**

388th Fighter Squadron F-16 Viper, Hill Air Force Base, Utah, Honorary Vice-Wing Commander

PRESENTATIONS

"Anatomy of a Medical Malpractice Lawsuit," Combined Grand Rounds, University of Utah Medical Center (2016)

"Trial Fundamentals," Utah Association for Justice (2015)

"Big Verdict – Small Town," Utah State Bar, Salt Lake City (2013)

"The Big Verdict," Utah Association for Justice, Salt Lake City (2013)

"Recent Trial Victories and Strategy," Utah Association for Justice, Salt Lake City (2012)

"Medical Malpractice in Utah," Utah Association for Justice, Salt Lake City (2009)

National Institute of Trial Advocacy, Salt Lake City (2007)

"Crafting the Closing Argument," Utah Association for Justice, Salt Lake City (2007)

"Prelitigation Practice," Association of Nurse Life Care Planners, Salt Lake City (2007)

"Hospital Liens," Utah Association for Justice, Salt Lake City (2006)

"Prelitigation Practice," Utah Association for Justice, Salt Lake City (2005)

"Discovery, Deposition and Motion Practice in the Complex Plaintiff's Case," Utah Association for Justice, Salt Lake City (2005)

"Medical Malpractice – The State of The Law," Intermountain Healthcare Park City Nursing Conference, Park City, Utah (2004)

"Medical Malpractice," United States Senate Committee on the Judiciary, Salt Lake City, Utah (2004)

"The Practice of Personal Injury Law: A Two-Case Study," Arizona State University School of Law, Phoenix, Arizona (2003 - 2007)

"Perinatal Legal Issues," Annual Northern Perinatal Outreach Conference, Jackson, Wyoming (2002)

"Medical Malpractice in Utah," National Business Institute, Salt Lake City, Utah (2002)

"Obstetrical Malpractice," Intermountain Health Care, Salt Lake City, Utah (2001)

"The Law and Children with Disabilities; Current Trends and Commitment to Child Advocacy: How Far Do We Go?" Primary Children's Medical Center, Salt Lake City, Utah (1999)

"Traumatic Brain Injury," Utah Trial Lawyers' Association, Salt Lake City, Utah (1996)

"Legal Empowerment - Parents' Rights for Children with Disabilities Conferences," Utah Parents Center and Developmental Disabilities, Inc., Salt Lake City, Utah (1996 - 1997)

"Ethics," Utah Trial Lawyers' Association, Salt Lake City, Utah (1995)

"Medical Malpractice—Prelitigation Panel Review," Utah State Division of Occupational and Professional Licensing (1995)

"Investigation Techniques, The Role of the Paralegal in the Deposition Process and Handling Medical Issues," Paralegal Seminars, Salt Lake City, Utah (1994)

"Ethics," Utah Trial Lawyers' Association, Salt Lake City, Utah (1993)

"Civil Justice Reform," Salt Lake County Bar Association (1992)

"Medical Malpractice," American College of Trial Lawyers, Snowbird, Utah (1991)

"Damages in Cases Involving Severe Injuries," Utah Trial Lawyers' Association, Salt Lake City, Utah (1991)

"Medical Malpractice: Law, Theory and Practice," American Bar Association National Institute, Snowbird, Utah (1990)

Panel Member: Medical Malpractice and Tort Reform, KUTV Channel 7 (1990)

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CHARLES H. THRONSON • PARSONS BEHLE & LATIMER

"Litigation and the Pediatric Head Injured Patient," Pediatric Head Injury Resource Center, Salt Lake City, Utah (1989)

"Products Liability and Engineer Responsibility," University of Utah, Department of Bioengineering (1988)

"Torts Update," Utah State Bar Annual Meeting, San Diego, California (1988)

"Tort Reform," Utah State Bar, Salt Lake City, Utah (1988)

"Torts, Damages and Remedies," Utah State Bar, Salt Lake City, Utah (1986)

"Medical Malpractice Award Limitations," Women's State Legislative Council of Utah, Salt Lake City, Utah (1986)

"Elements of a Malpractice Case," Utah Medical Records Association, Salt Lake City, Utah (1986)

"Products Liability," American Society of Mechanical Engineers (1983)

PUBLICATIONS

Co-Author: "Child or Chattel? Minor's Claims for Medical Expenses," *Utah Trial Journal* (Winter 2018)

Co-Author: "*Condemarin v. University Hospital*, a 24-Year Retrospective," *Utah Trial Journal*, Vol. 36, No. 2 (Spring/Summer 2013)

Co-Author: "Admissibility of Post-Injury Conduct - Subsequent Remedial Measures and Punitive Damages," *Utah Trial Journal*, Vol. 35, No. 2 (Winter 2012)

"The Real Bogeyman," *Utah Trial Journal* (Winter/Spring 2010)

"Just Lucky," *Utah Trial Journal* (Summer/Fall 2010)

Co-Author: "Discoverability and Admissibility of Immigration Status," *Utah Trial Journal* (Summer/Fall 2010)

"In Praise of Regulation," *Utah Trial Journal* (Spring/Summer 2010)

Co-Author: "The Wrongful Death Guarantee, Part II," *Utah Trial Journal* (Spring 2006)

Co-Author: "Health Courts: Not So Fair and Equitable," *Utah Trial Journal*

P A R S O N S B E H L E & L A T I M E R

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FIRM PROFILE

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Parsons Behle & Latimer is one of the oldest and best-known firms in the Intermountain Region. Our first clients were mining companies, one of the industries that helped fuel the growth of the West. Over time, our reputation and client base have grown with the dynamic Intermountain Region.

Today, our firm offers a complete range of legal services to all types of industries. In addition to our firm's unique expertise in the natural resources industry, we have forged relationships with multi-billion dollar corporations, high-tech industries of every type, financial organizations, public utility companies, renewable energy companies, start-ups, state, local and federal agencies, and individuals.

MISSION

Parsons Behle & Latimer's purpose is to provide a broad spectrum of superior quality legal services in industries and practice areas required by its clients in a prompt, efficient and cost effective manner.

CORE VALUES

- Client Service
- Professional Excellence
- Integrity
- Diversity, Equity & Inclusion
- Ethics & Professionalism
- Collegiality
- Community Service
- Innovation
- Depth of Knowledge

GOALS

- Commitment to recruit, hire, mentor and retain a diverse and inclusive workforce of highly-talented lawyers and professional staff
- Continued focus on providing excellent client service
- Strategic growth through lateral acquisition and new market expansion
- Align business development strategies in all markets
- Drive profitability through increased productivity and fiscal responsibility
- Utilize technology and innovation to drive efficiencies, pricing predictability, reduce costs and add increased value to our clients

ORGANIZATION / GOVERNANCE

Parsons Behle & Latimer is structured as a professional law corporation. The firm's Board of Directors serves as its governing body. Our Board of Directors consists of five members, who are elected annually by shareholders of the firm. The Directors also serve as our firm's officers and elect the Chairperson of the Board and President annually. Parsons' primary practice teams are led by eight department chairs focusing on Corporate & Tax; Employment, Labor & Immigration; Energy, Environmental & Natural Resources; Government Relations & Lobbying; Healthcare; Intellectual Property; Litigation; and Real Estate law.

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KEY INDUSTRIES AND PRACTICE AREAS

- Agriculture
- Antitrust & Competition
- Aviation
- Banking & Financial Services
- Construction
- Business Bankruptcy & Restructuring
- Corporate
- Cybersecurity & Data Privacy
- Dental
- Divorce & Family
- Employment & Labor
- Energy & Utilities
- Environmental & Natural Resources
- Estate Planning
- Government Relations & Lobbying
- Healthcare
- Intellectual Property
- Litigation
- Mining
- Oil & Gas
- Plaintiffs Personal Injury
- Real Estate
- Renewable Energy
- Resorts & Recreation
- Government Enforcement, Securities & White-Collar Defense
- Tax
- Technology

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Gen. Commercial
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Super
Lawyers®

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Attorneys
listed



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Lawyer Ratings

57

Attorneys
rated

MEMBERSHIPS



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